

Nash Stream Management Plan

2017

Email Comments

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Thursday, January 26, 2017 7:23 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Re: Trail Closings?

----- Forwarded Message -----

Subject:Re: Trail Closings?
Date:Tue, 24 Jan 2017 12:16:22 -0500
From:Nick Sommer <nick@theattiasgroup.com>
To:Larry Gomes <feedback@nashstreamforest.com>

Dear Brad Simpkins,
Attention: Nash Stream Plan NH Division of Forests and Lands

I am an active ATV enthusiast from MA and due to lack of trails in my state I almost exclusively ride in NH and pay registration fees every year for two bikes. The sport is growing and is helping to create economies in rural areas. In order to keep the sport and help the towns that let us ride on their land I propose maintaining and opening new trails instead of closing them especially since there are no laws or covenants that prohibit ATV or UTV trails in Nash Stream Forest. There are over 19,000 NH residents that registered OHRV's in NH in 2016. That's over 1 Million dollars in revenue! Those residents have just as much right to recreate in Nash Stream Forest as hikers, fishermen, hunters, snowmobilers and camp owners. Atvs bring in money, hikers don't.

I suggest making West Side ATV Trail and Kelsey Notch ATV Trail, permanent trails. In order to expand on the existing trails i suggest allowing the construction of a new 1.3-mile Southern Connector ATV Trail between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas. These riders will boost the economy by purchasing gas and food. In addition to the West side Trail I suggest allowing the construction of a new 6.3-mile East West Corridor ATV Trail that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark village.

I know there is a concern for noise pollution however all of the current and proposed ATV/UTV trails are located along the outer perimeter of the forest, creating no negative impacts on the traditional uses in the heart of the forest. Even though logging trucks, cars, pickups, 4WD vehicles, motorcycles and registered trail bikes can access the heart of the forest by traveling along its gravel roads, there will be no ATV or UTV trails on these roads. Adding up the footprint of all the camps, gravel roads, snowmobile trails, hiking trails and ATV/UTV trails (both current and proposed) equals 528 acres or 1.3% of the forest. In other words, 98.7% of the forest would be left in its natural state, which certainly meets goal "c" listed above. Only 70.7 acres or .18 percent of the forest (less than ¼ of one percent) would be used by all of the current and proposed ATV trails.

Please keep in mind there are already plenty of areas in New Hampshire and all over New England where people can hike and not have to even see or hear an ATV. Those areas outnumber ATV trails immensely. Let us ride!

Best,

Nick Sommer



Nick Sommer
Marketing Director, The Attias Group Real Estate

Mobile: 978.760.1453

Address: 48 Thoreau Street, Concord MA

Website: www.theattiasgroup.com

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Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, January 27, 2017 11:42 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Atv trails

----- Forwarded Message -----

Subject: Atv trails
Date: Wed, 25 Jan 2017 18:49:06 -0500
From: Ernie MacDonald <macdonaldernie@gmail.com>
To: feedback@nashstreamforest.com

The Atv trails in northern NH bring in revenue during the summer for the people that work around those areas. If there were more trails opened for Atvs around Nh and the price was raised for registration there would be more revenue to take care of those trails and the environment around them. I don't think we need to close trails, we need to open more and get more people involved within the sport. I live in the lakes region and there are no trails within 20 miles of me. Me personally, would love to have a trail from lakes region to northern NH. Thank you for letting us send in our opinions.

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, January 27, 2017 11:43 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash stream forest

----- Forwarded Message -----

Subject: Nash stream forest
Date: Wed, 25 Jan 2017 19:52:59 -0500
From: Robert Gubala <rjgubala@aol.com>
To: feedback@nashstreamforest.com

Please do not shut down the ATV trails in Nash stream forest. I come from Massachusetts to ride your trails. The beauty of New Hampshire brings me to Jericho State Park and Nash stream forest.

I would rather not see Nash stream forest shut down or laws passed preventing future ATV trails. Maybe you could come up with an advisory group of ATV and hikers from the Nash stream forest. Who could help maintain the future of Nash stream forest for all groups, whether they be ATV or hiking or snowshoeing.

Thanks
Robert Gubala
Board of Directors Stateline riders ATV club

Sent from my iPhone

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, January 27, 2017 11:45 AM
To: DRED: Nash Stream Plan
Subject: Fwd: ATV access

----- Forwarded Message -----

Subject:ATV access
Date:Tue, 24 Jan 2017 15:16:55 +0000
From:Janet Heath <bungyrd@hotmail.com>
To:feedback@nashstreamforest.com <feedback@nashstreamforest.com>

We need atv access to Nash Stream Forest. We have worked hard to create a working trail system to help the economy in the area grow and this is part of it. Nash stream is government land and we should be able to use it ! Janet Heath Colebrook NH Metallak Trail Patrol

Sent from Mail for Windows 10

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, January 27, 2017 11:46 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash stream support

----- Forwarded Message -----

Subject: Nash stream support
Date: Wed, 25 Jan 2017 09:03:35 -0500
From: Danielle Warner <daniellefort@yahoo.com>
To: Feedback <feedback@nashstreamforest.com>

Upsetting to hear about ATV trails possibly closing down. Born and raised here in Berlin, we have had so many years of nothing happening to attract people to our area to support our local businesses including hotels, restaurants, stores, etc. everyone we meet coming or going on ATVs are friendly, helpful if your in a breakdown situation, and for the most part respect the land. There will always be those who do damage but that comes with any type of activity. I have seen families come together young and old on the trails. Its a great way to spend an afternoon riding getting out to enjoy what nature has to offer. Once your ATV is paid for, its a fairly inexpensive activity most can enjoy. I hope the trail system remains. My daughter who is blind also enjoys the rides and being able to be out in the woods listening to the sounds of nature or grabbing her fishing pole and dropping a line in the river along the trails. My hope is to keep this trail system alive and well and even maybe expand over time.

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, February 01, 2017 8:35 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Shut down of ATV trails

----- Forwarded Message -----

Subject: Shut down of ATV trails
Date: Sun, 29 Jan 2017 10:47:20 -0500
From: Stephanie Ives <sives5689@gmail.com>
To: feedback@nashstreamforest.com

Good morning,

I would like to voice my opinion and concerns regarding the proposed closure of ATV trails that are crucial to the "Ride the Wilds" trail system. Every year, myself and thousands of other NH ATV riders travel to Coos county to enjoy the interconnected trail system and to visit local establishments. The thousands of visitors that travel every year to Coos county help to stimulate and grow local businesses and help the overall local communities.

Closing off chunks of the interconnected riding trails would drive down the possibilities for economic growth to those areas. Nurturing the continued growth and expansion of these trails help to bring more and more business to these areas. Events like the Jericho ATV festival and Camp RZR bring in thousands of out of state visitors and raise more money for the trails through the NH registration process. I strongly urge against the closure of any trail system in NH. Please do not take away the enjoyment of these trails away from the riders and also please consider the economical impact this could cause, especially if this movement starts a snowball effect. Thank you for your attention to this plea.

Warm regards,
Stephanie Chandonnet

Guinn, William

From: Kris pastoriza <krispastoriza@gmail.com>
Sent: Friday, February 03, 2017 8:46 AM
To: DRED: Nash Stream Plan
Subject: ATV use in the Forest

I write to support the exclusion of ATV's from the Nash Stream Forest, except for people with disabilities that render them unable to walk.

I'm concerned that the pilot program for ATV's lead to established ATV use which looks likely to lead to further development of trails, and extension of trails to areas that had formerly been protected. I suspect people and organizations contributed money for this forest with the understanding that ATV use was prohibited, and that many of them would not have contributed had they known ATV use would be allowed.

While adaptive change is important, broken contracts threaten the social fabric.

With global warming, recreational burning of fossil fuels should be curtailed. ATV's also cause noise-pollution, and very few areas in the State now offer quiet. Noise is a stressor for animal and people (and maybe even flora.)

Also, once an area is degraded, it has less standing when faced with future degradation. So Northern Pass, for example, could site ATV use in the Forest as an existing "intrusion" that would make the impact of two new rows of tall transmission towers less than if the forest did not already host such activity. A similar situation exists with Granite Reliable. Any future industrial impacts look small in comparison, and the tendency is to keep the damage in the already degraded corridors.

Kris Pastoriza
Easton, NH



ATV Riders Call to Action

Deadline is March 1, 2017



Three of the largest environmental groups in NH have teamed up to try and SHUT DOWN the ATV trails in Nash Stream Forest and prevent new trails from being developed. **If they are successful, what trails will they target next?**

What can you do?

1	Attend a public hearing	
	Concord, NH Thur. Feb 9, 2017 9:00am to 11:00am Dept. of Resources & Development 172 Pembroke Road Concord, NH 03301	Whitefield, NH Thur. Feb 16, 2017 6:00pm to 8:00pm White Mt. Regional High School 127 Regional Road Whitefield, NH 03598
2	Send an email with your input or questions on the new Nash Stream Forest plan to: feedback@nashstreamforest.com	
3	Call the Nash Stream OHRV Task Force with your questions or ask for assistance with your input: 508-366-1172 (Larry)	



Doing nothing ensures the opposition will win.

Take a stand for your trails.

Guinn, William

From: Guinn, William
Sent: Thursday, February 02, 2017 11:04 AM
To: DRED: Nash Stream Plan
Cc: Simpkins, Brad; Stanwood, Sabrina
Subject: FW: Feb. 16th Whitefield Regional, Public Session re: Nash Stream Management Plan
Attachments: Critique of NSF Draft.docx; ATT00001.htm; Line by Line NSF 1995 vs 2017.docx; ATT00002.htm

From: Machinist, Margaret
Sent: Thursday, February 02, 2017 10:50 AM
To: Guinn, William
Subject: FW: Feb. 16th Whitefield Regional, Public Session re: Nash Stream Management Plan

From: David Govatski [<mailto:david.govatski@gmail.com>]
Sent: Wednesday, February 01, 2017 10:38 PM
To: Jeff Lougee; Machinist, Margaret; John Lanier
Subject: Fwd: Feb. 16th Whitefield Regional, Public Session re: Nash Stream Management Plan

Comments from the group opposing more ATV trails.

David Govatski
Jefferson, NH

Begin forwarded message:

From: Abby Evankow <abbyaustin@myfairpoint.net>
Date: February 1, 2017 at 21:33:00 EST
To: Rebecca Oreskes <echotuck@gmail.com>, jeremiah <bullfrog_03584@yahoo.com>, Leane Rexford <leane@northernoasis.biz>, Michele Cormier <pcormier@ne.rr.com>, Doug Mayer <dmayer@cartalk.com>, Chris Rice <racetelemark@hotmail.com>, Andy Muller <amuller@outdoors.org>, Mike Micucci <mjmicucci@gmail.com>, laura brockett <lbrockett@gmail.com>, Cam Bradshaw <caminski@me.com>, Elissa Gramling <elissagramling@hotmail.com>, Karen Bradley <k2peakhealth@gmail.com>, Stephanie Kelliher <stephkelliher@yahoo.com>, Megan Johnson <megejohnson@gmail.com>, Lisa Gilbert <lisagilbert4@gmail.com>, Jamie Welch <jwelch@sau3.org>, Phoebe Backler <phbackler@gmail.com>, Sally Micucci <sallymicucci@gmail.com>, Lucy Wyman <craigloo@yahoo.com>, Gary Newfield <GNewField@yahoo.com>, David Govatski <david.govatski@gmail.com>, susan lorenzen <sclorenzen@yahoo.com>, Barbara Arnold <barbara.arnold51@gmail.com>, James Hunt <jimhunt66@gmail.com>, Nancy DeCoursey <nwdecourcey@ne.rr.com>, claude pigeon <claudepig@msn.com>, wendy macdonald <seasonsoftheheart@ne.rr.com>, Roberta Arbree <rarbree@aol.com>, Jane Brannen <janebrannen@juno.com>, Dave Salisbury <salis_da@yahoo.com>, Al & Judy Hudson <abhudson@anthro.umass.edu>, Mark Macdonald <villa_incognito@icloud.com>, Howie Wemyss <howie@mt-washington.com>, Sue Wemyss <sue@mt-washington.com>, Angela

Brown <angela_f_brown@yahoo.com>, Joy <123yogajoy@gmail.com>, Seth Quarrier <seth.quarrier@gmail.com>, Kara Hunter <khsimplestructure@gmail.com>, Jeff Parker <motomadman02@yahoo.com>, Mary Benkert <alltogethernownewsletter@gmail.com>
Subject: Feb. 16th Whitefield Regional, Public Session re: Nash Stream Management Plan

Hi Friends,

In this time of worrisome national events - I am focusing on what I can do here at home: protect our beautiful undeveloped lands. Here is an upcoming meeting.

Date: January 18, 2017

FOR IMMEDIATE RELEASE

NH Division of Forests and Lands to Hold Public Comment Sessions
on the Draft Nash Stream Forest Management Plan

(Concord, NH) The New Hampshire Division of Forests and Lands will hold two public input sessions to solicit comment on the draft Nash Stream Forest Management Plan. The information sessions will be held on the following dates and locations:

Thursday, February 9th Department of Resources and Economic Development
Headquarters, 172 Pembroke Road, Concord NH
9 am to 11 am

Thursday, February 16th White Mountains Regional High School, 127 Regional Road,
Whitefield, NH
6 pm to 8 pm

The session will begin with an overview of the plan revision process, followed by an opportunity for the public to provide comments. Comments will be accepted until close of business on Friday, March 3, 2017 and can be provided in person at the public sessions, sent via email to nashstreamplan@dred.nh.gov, or in writing to:

Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

A copy of the draft plan, as well as other information regarding Nash Stream Forest, can be viewed by visiting www.nhdf.org and clicking on the "Nash Stream Forest DRAFT Management Plan Revision" item under News and Information.

The New Hampshire Division of Forests and Lands is part of the Department of Resources and Economic Development. Its mission is to protect and promote the values provided by trees and forests. For more information about the Division of Forests and Lands visit www.nhdf.org or call 603-271-2214.

Here are just some of the concerns about the proposed draft plan:

1. The original DRED management plan for Nash Stream Forest prohibited ATVs and OHRVs, because the traditional public recreational uses allowed by prior landowners did not include motorized access and because the ecological integrity of the working forest was a key

management objective.

2. DRED has now established two connector trails through Nash Stream Forest. The new management plan should keep West Side Trail as a permanent trail and the Kelsey Notch Trail as a pilot as outlined by the NH Council on Resources & Development. The new management plan should not allow any new trails within Nash Stream Forest.

3. The existing Ride the Wilds ATV trail network combined with the Jericho Mountain State Park provides ample opportunity for ATV trail riding in Coos County.

4. There are issues and challenges with the existing RTW network. These issues and challenges should be worked out before any new ATV trails are created.

5. We encourage the development of a county wide trail master plan for all recreational trail users, including hiking, biking, cross country, skiing, equestrian and ATV trails. Such a plan should be developed with all stakeholders at the table. The true economic development opportunity here is for all recreationists to play a role in an effort that preserves existing recreation economies and builds new opportunities.

After Commissioner Rose came to Gorham in May 2016 and heard first hand of the problems of the Ride the Wilds OHRV trail here in Gorham, he wrote a letter to the town and spoke of commissioning “a comprehensive strategic trails study” in Coos County. He mentioned the need for New Hampshire to have a “long term plan for the trails systems” that includes “all stakeholders, residents and communities.” He spoke of the need to “pause to evaluate the status of our trails system - particularly within the OHRV network - and the overall impacts, trends, benefits and challenges.” (Letter from Commissioner Rose to Town of Gorham, May 23, 2016) So far there is no trails study, no long term plan and no pause in OHRV trail expansion not to mention, no fixing of the existing problems in Gorham.

The ATV clubs are expected to show up in force in Whitefield to push for another trail in Nash Stream. It would be good if we could show up to demonstrate that the North Country is more than just an ATV club; that plenty of residents value ‘wild’ quiet places. The ATV clubs represent a small minority of residents and should not be seen to speak for us all.

U.S. census 2005 : NH residents Participating in ACTIVE outdoor recreation:
wildlife viewing, 445,000
hiking/walking trails 349,570
snowsports 254,233
bicycling 241,100
paddling 225,662
fishing 142,149
hunting 51,116

ATV registrations 2015: 27,000, predicted to peak at 29,000 (Chris Gamache, DRED, at Feb 5, 2016 Coos County Commission meeting, Berlin Daily Sun, Feb. 15, 2016) http://www.berlindailysun.com/index.php?option=com_content&view=article&id=56882:bureau-of-trails-working-on-master-plan-for-atv-system-in-north-country&catid=103&Itemid=442

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:36 PM
To: DRED: Nash Stream Plan
Subject: Fwd: trails

----- Forwarded Message -----

Subject:trails
Date:Fri, 3 Feb 2017 14:19:57 +0000 (UTC)
From:gary kainer <kxr440@yahoo.com>
Reply-To:gary kainer <kxr440@yahoo.com>
To:feedback@nashstreamforest.com

hello

keep these trails open! n.h. is an absolute wonderland of atv an snowmobile trails, me an my family come to n.h. just for this reason, thank you

Gary Kainer

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:38 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Ride the wilds

----- Forwarded Message -----

Subject: Ride the wilds
Date: Fri, 3 Feb 2017 11:34:19 -0500
From: Fred Hoffman <hoffman3113@gmail.com>
To: feedback@nashstreamforest.com
CC: Fred Hoffman <hoffman3113@gmail.com>

Hi I'm Fred hoffman from upstate New York in the small town of east greenbush which is about 15 minutes east of Albany. We made the 4.5 hour trip one way to visit camp RZR last year at Jericho state park. And I wanna say I had a blast there even though the weather was not the best. But that did not stop me or my buddy from going up and checking out what New Hampshire had to offer with riding the wilds trail system. I am super impressed we rode almost 400 miles and wasn't even trying to ride that much. We just went for another trip up the weekend of jan 27th. There was a little bit of snow and cold but still we had a blast. I brought up 5 machines total. And my buddy's loved it and cannot wait to get back up and ride when the trails open fully. We already are planning a trip to come back up Memorial Day weekend and many more during the summer and fall months. We will probably be coming up with twice the amount off machine. Just because we told our buddy's about it and they wanna see what it's all about to legally ride somewhere with the vast amount of trails. It's an amazing place to ride with all of the scenery and nice people we have met thru our 2 trips so far. I just wanna say keep up the excellent work and you will have the ultimate Offroad trail system in the country maybe even the world. Two thumbs up from me and everybody that I have brought to experience the ride the wilds system. They all cannot wait to get back up and ride again! Thank you very much for allowing us the opportunity to legally ride such a trail system!

Sent from my iPhone

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:39 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Are

----- Forwarded Message -----

Subject: Are
Date: Fri, 3 Feb 2017 12:43:58 -0500
From: Jen <jlkmn26@aol.com>
To: feedback@nashstreamforest.com

We enjoy the trails and getting out with the family to enjoy nature and the outdoors.
please let this continue for our family

Jen Lukeman
Lancaster nh

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:40 PM
To: DRED: Nash Stream Plan

----- Forwarded Message -----

Date: Fri, 3 Feb 2017 18:25:37 -0500
From: Scott Somes <ssomes914@cox.net>
To: feedback@nashstreamforest.com

My feelings on this if the trails are already there leave them be and if new trails are to be built from what I seen in New Hampshire they are very good about protecting the environment by build bridges over water and marking trails that cannot be used because of mud or for some other reason. I have rode in NH and have seen very little to none environmental damage on the trails that I have rode on and from what I seen they are very good about enforcement also.

Regards

Scott L. Somes
Captain Fire Police
Town of Manchester
TIM Instructor
ssomes914@cox.net

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:41 PM
To: DRED: Nash Stream Plan
Subject: Fwd: trails

----- Forwarded Message -----

Subject:trails
Date:Sat, 4 Feb 2017 16:48:14 -0500
From: Wendell kenison jr <wendell.kenison@gmail.com>
To:feedback@nashstreamforest.com

please do not allow the trails to close, we ride the trails there and enjoy them very much.thank you wendell kenison

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 06, 2017 7:41 PM
To: DRED: Nash Stream Plan
Subject: Fwd: trails

----- Forwarded Message -----

Subject:trails
Date:Sat, 4 Feb 2017 19:10:25 -0500
From:Paul & Gisele Ouellette <peoinc4@gmail.com>
To:feedback@nashstreamforest.com

I would like to say I am totally against closing the trails in Nash Stream, and not adding any new ones.. What is becoming of our little world up here in the North Country... It is for all of us to decide not them.. If I can help in another way PLEASE let me know...

Regards,

Gisele Ouellette in Milan, NH

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 07, 2017 1:35 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash stream forest

*Second
comment
submitted
(first 1/25)*

----- Forwarded Message -----

Subject: Nash stream forest
Date: Fri, 3 Feb 2017 15:05:48 -0500
From: Robert Gubala <rjgubala@aol.com>
To: Larry Gomes <feedback@nashstreamforest.com>

Hello, I come up from Massachusetts to ride trails in Nash stream forest.

I like the Westside ATV trail and the Kelsey notch ATV trail. I have looked at the other ATV trails they are proposing, the 1.3 mile Southern connector ATV trail between the west side trail and the southern boundary of the Nash stream forest that Will allow riders to gain access from local trails and get gas. I have also reviewed the 6.3 miles east west corner ATV trail that will run along the southern boundary of the Forest in exit onto Percy Road illuminating the need for through traffic to go through Stark Village which is definitely a plus!

There are 15 miles of gravel roads for public access where hikers and hunters can access and there are 47 miles of trail for snowmobiles, 21 miles of trails for hikers. There are 10.6 miles of current ATV trails and 8.9 miles of newly requested ATV/UTV trails. And all of the current and proposed ATV trails are on the outer perimeter of the forest creating no negative impacts on the traditional uses in the heart of the forest even though logging trucks, cars, pick ups, and other vehicles can access the heart of the forest by traveling along it's gravel roads there will be no ATV or UTV trails on these roads.

When the state forest land was bought the three goals were to in sure that the property continues to contribute to forest economy through the sale of wood products and provide continued public access for recreation and protect the areas natural beauty and ecological values. With the trails being on the outer perimeter of the state forest that will not affect The natural beauty of the forest, and there is no laws or covenants that prohibit the ATV/UTV trails in the forest. There are over 19,000 New Hampshire residents that are registered OHRV users and they should have just as much right to recreate in the Nash Stream forest as hikers snowmobilers and fisherman.

Thank you for listening,
Robert Gubala
Board of Directors Stateline riders ATV club Sent from my iPhone

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 07, 2017 1:41 PM
To: DRED: Nash Stream Plan
Subject: Fwd: ATVs in Nash Stream Forest

----- Forwarded Message -----

Subject: ATVs in Nash Stream Forest
Date: Fri, 27 Jan 2017 20:49:38 +0000
From: Denise, Eric <edenise@usendoscopy.com>
To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>

Hello All

I have had the opportunity to review the letter sent by the Society for the Protection of NH Forests. I have been both an ATV enthusiast and a snowmobiling enthusiast my entire life. I have enjoyed the snowmobile trail system in Nash Stream since I graduated college in 1997. Although this letter sent by the Society is directed more towards the use of ATVs within Nash Stream Forest this is just the first step in their pursuit to eliminate motorized vehicle usage within this area.

As towns in northern NH have seen over the last 4-5 years the year round recreational use, both motorized and nonmotorized, has increased dramatically, especially the use of ATVs. This has created a lot of revenue for area businesses which the north country desperately needs. If these trails are closed towns such as Groveton and Stark could lose some of this valuable revenue from decrease ATV traffic. Creating more trails in these areas could create more revenue and possibly increase small business activity in the area.

Again closing this area could also be a step to shut down snowmobile trails and this would have an even bigger impact on this area. The North Country needs these trails for both snowmobiling and ATVs to keep people coming to this area for recreational use. Please look into this request from the Society with an open mind and always remember the motorized enthusiasts/community, in my opinion, bring a lot more to the table in regards to revenue than those who are nonmotorized enthusiasts.

Regards

Eric Denise
Product Specialist
US Endoscopy
A Subsidiary of STERIS Corporation
3976 Heisley Road Mentor, OH 44060
Direct: 440-639-4494
Mobile: 603-548-7807
Email: edenise@usendoscopy.com

Web: www.usendoscopy.com

Listening... and delivering solutions®

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 07, 2017 1:50 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Letter

----- Forwarded Message -----

Subject: Letter

Date: Tue, 7 Feb 2017 15:04:47 +0000

From: paul mentzer <pmhiker@msn.com>

To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Mr. Simpkins

I ask that you consider the less physically fit people in our state.

There are many avid ATV riders, who are in their 60's, 70's, or even 80's who still want to be able to experience the Nash Stream Forest. In their younger days they were able to enjoy the wilderness by being able to hike into the back woods or climb to mountain peaks. Now being less physically able, they are not able to enjoy these hard to get to areas. An ATV or other off road vehicle gives them the access they crave.

We all see that there is a small portion of parking lots that are designated for handicap parking. Many of New Hampshire's natural outdoor attractions have special paths to enable access for all.

Why shouldn't there be a small portion of the Nash Stream set aside to a few ATV trails?

Specifically, keep West Side and Kelsey Notch trails and approve new trails: Southern Connector ATV Trail between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas, . Allow the construction of a new 6.3-mile East West Corridor ATV Trail that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark village. Include an option for allowing future construction of a 1.3-mile East West Corridor Extension ATV Trail that will exit onto Bell Hill Road.

Sincerely,

Paul Mentzer
14 Davis Dr

Londonderry, NH 03053

Guinn, William

From: Lynch <lynch4ns@earthlink.net>
Sent: Thursday, February 09, 2017 1:14 PM
To: Machinist, Margaret
Subject: Nash Stream Plan

Hi Maggie,

The 1995 Plan calls for Control Areas, have they been established? Explain yes or no.

Is it possible to pick up a Draft Plan already printed out at the office or do I need to print it?

Thank you,
Mike Lynch

Guinn, William

From: Tom Meredith <ThomasSMeredith1@outlook.com>
Sent: Sunday, February 12, 2017 8:18 PM
To: DRED: Nash Stream Plan
Subject: nash stream forest management plan

To Brad Simkins
Director NH Forests and Lands
RE: Nash Stream Forest Management Plan

I live in Milan, NH and have done much hiking and some skiing in the Nash Stream Forest. I have reviewed the draft management plan and in general I support the plan in its current form. I feel strongly that ATV and UTV trails and access should NOT be expanded. There are a multitude of ATV trails in Coos County and there is no need or reason to expand ATV/UTV trails in the Nash Stream Forest, which is the position stated in the draft plan.

Sincerely,
Thomas Meredith
1210 Milan Rd.
Milan, NH 03588

Guinn, William

From: Gary Robertson <bicycle81@yahoo.com>
Sent: Monday, February 13, 2017 5:23 PM
To: DRED: Nash Stream Plan
Subject: ATVs and Nash Stream

To Whom it May Concern,

ATV co-use with bicycling and hiking trails is essentially banning hiking and biking on those trails because of dust, erosion, flying rocks, and safety issues. I have tried several times to ride with my wife on co-use trails. It has been totally unsatisfactory, scary, and dangerous. I do not bicycle or hike to encounter conditions that urban police forces would find reckless and a menace to public safety. This is supposed to be exposure to nature, not some sort of trial by fire.

I would rather ride my bicycle on a public highway with heavy commercial traffic than ride it on an ATV co-use trail.

ATV use on ATV only trails is the only reasonably sane alternative, no one in there right mind wants to hike on one.

De facto closing of a large natural area, a wonderful high quality trout stream watershed, a treasure such as Nash Stream, to serve those who profit from the sales of machines that make noise pollution, air pollution, detract from other uses and degrade water quality and tranquility is not a sound decision for the future.

Hunting, fishing, hiking, camping, trapping, limited bicycling, these are great uses for the Nash Stream area. To effectively ban that use for the average safety conscious and peace seeking citizen so that people can race machines is not beneficial to the majority of citizens.

Gary Robertson
Phone: (603) 528-5217
Cell: (603) 998-8970
Vice President, VT/NH Chapter
The American Chestnut Foundation
www.acf.org

Guinn, William

From: M Resta Detwiler <myladyisacat@yahoo.com>
Sent: Monday, February 13, 2017 5:30 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Plan
Attachments: Nash Stream Forest.docx

Hi! Attached you will find my letter in reference to the above. Thank you.

February 13, 2017

Brad Simpkins
DRED Division of Forests and Lands
172 Pembroke Road
Concord, NH, 03301

Dear Mr. Simpkins:

Re: Nash Stream Forest

I believe the right course of action for DRED to take in the new management plan for Nash Stream Forest is to limit ATV use over the next plan period to the two trails that now exist. No new trails should be established. Thank you for your time.

Sincerely,

M. Resta Detwiler
160 Spruce Drive
Farmington, NH 03835
(603) 923-5627

Guinn, William

From: Nancy/Will DeCoursey <nwdecoursey@ne.rr.com>
Sent: Tuesday, February 14, 2017 8:14 AM
To: DRED: Nash Stream Plan
Subject: against ATV trail

We would like to go on record as being against improving or adding to ATV trails within the Nash Stream State Forest.

NH Fish and Game has stated it does not currently have enough staff (Conservation Officers) to manage issues with existing trails-expanding trails while being unable to monitor traffic, accidents and infractions is irresponsible and dangerous to all trail users. **No trails should be added until we can safely and properly take care of what now exist.**

When "non-motorized trail users"-**Hikers**, bikers, snowshoers, bird watchers, etc-feel a need to move from one trail to another, they **do not expect a connecting trail to be built between where they are and where they want to go next.** ATV users can trailer their machines from one trail to the next. Human trail users do this by walking or carpooling.

The Nash Stream State Forest is a beautiful, unique treasure. If **irresponsible changes** to its public use are made, they **cannot be undone.**

Nancy and Will DeCoursey, Jefferson, NH

Guinn, William

From: Jim Pasman <jwpasman@verizon.net>
Sent: Tuesday, February 14, 2017 10:58 AM
To: DRED: Nash Stream Plan
Subject: PARC Comments on Nash Stream Forest ATV Use
Attachments: 'JimPasman'.vcf

Hello,
As Chair of PARC (Protectors of the Ammonoosuc River Corridor a volunteer organization of fifty people whose mission includes protecting the natural environment and beauty of our great state), we would like to voice our support for limiting ATV use within the Nash Stream Forest.

The Forest is a special, unique area whose water and land resources and natural beauty should be enjoyed by the public and protected for its environmental value. While it is understood that forestry activity needed to maintain the forest using machinery is necessary, ATVs add no value to the greater public, introduce noise and air pollution from exhaust, and unnecessarily degrade the trails and increase the risk of soil erosion.

Our position is that internal combustion machinery should be deployed ONLY for silvicultural purposes and, if possible, the use of all machines such as ATVs should be prohibited altogether. However, limiting their use to existing approved trails is an acceptable compromise. Let's not look for opportunities to expand the damage of off road "recreation" but point those interested in that activity to lands dedicated solely for that purpose without degrading our natural and otherwise pristine forest, streams, ponds and rivers.

Sincerely,
Jim Pasman
Chair - PARC
nhparc@gmail.com

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 6:54 PM
To: DRED: Nash Stream Plan
Subject: Fwd: ATV NASH STREAM FOREST PLAN
Attachments: Scan.jpeg

Please see attached image which contains a letter.

----- Forwarded Message -----

Subject: ATV NASH STREAM FOREST PLAN
Date: Sat, 11 Feb 2017 11:09:41 -0500
From: Thomas Wheeler <picman123@comcast.net>
To: feedback@nashstreamforest.com
CC: Thomas Wheeler <picman123@comcast.net>

2/11/2017

DRED
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Plan

Dear Sir or Madam,

My wife and I are retired and have a camp in Colebrook NH which we purchased specifically to take advantage of the Great North Woods ATV trail systems. We are avid UTV riders and enjoy spending our retirement getting out in the woods and sight – seeing.

I do not want to see any trails in Nash Stream shut down. In fact, I would like to see more trails developed. I respectfully request these trails be included in the new plan:

- 1) West Side Trail
- 2) Kelsey Notch Trail
- 3) Establish a new connector trail to allow riders to get from the West Side Trail to the gas station located about a mile SW of the Nash Stream entrance gate.
- 4) Establish a new east - west corridor trail along the southern boundary of Nash Stream forest so riders can get off the roads.
- 5) Extend the east - west corridor trail to the eastern boundary of the forest along the existing snowmobile trail at some point in the future.

The entire footprint of these ATV trails is around 70 acres or less than ¼ of 1 percent of the 40,000+ acres in the forest. In fact, if you add up all of the trails, roads and camps in Nash Stream it comes to just over 500 acres, which means that over 98% of the forest land would still be open, even with these new ATV trails.

This land was purchased with money from the residents of New Hampshire and should be available to be used by all residents.

Respectfully,



Tom Wheeler
2 Airline Dr
Amherst, NH 03031

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 6:57 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream

----- Forwarded Message -----

Subject:Nash Stream

Date:Sat, 11 Feb 2017 19:56:40 +0000

From:Shay Deline - Small <boxergirl1771@hotmail.com>

To:feedback@nashstreamforest.com <feedback@nashstreamforest.com>

February 11, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Shay Small, Peter Small 1723 US Route# 3 Stratford, NH 03590

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 6:59 PM
To: DRED: Nash Stream Plan
Subject: Fwd: nash stream

----- Forwarded Message -----

Subject: nash stream
Date: Sun, 12 Feb 2017 07:36:37 -0500
From: barkpeeler@aol.com
To: feedback@nashstreamforest.com

February 12, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Brad & Donna Sampson
15 Beechwood Ave
Pembroke, Ma.

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 7:02 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Forest land
Attachments: Nash Stream and Forrest land.docx

----- Forwarded Message -----

Subject: Nash Stream Forest land
Date: Sun, 12 Feb 2017 11:04:54 -0500
From: jsjbaker@aol.com
To: feedback@nashstreamforest.com

I have attached the letter for Nash Stream Forest land.

Jackie Baker
1 First St Tyngsborough MA

Mike Biederman
390 101 E Bedford New Hampshire

seasonal site at Big Rock Campground

February 12, 2017

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

When the Nash Stream land was purchased, these were the goals:

- a. "Ensure that the property continues to contribute to forest economy through the sale of wood products; "
- b. "Provide continued public access for recreation; and"

Please consider the following:

1. Include the 8.0-mile West Side ATV Trail as a permanent trail.
2. Include the 2.6-mile Kelsey Notch ATV Trail as a permanent trail.
3. Allow the construction of a new 1.3-mile Southern Connector ATV Trail between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas.
4. Allow the construction of a new 6.3-mile East West Corridor ATV Trail that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark village.
5. Include an option for allowing future construction of a 1.3-mile East West Corridor Extension ATV Trail that will exit onto Bell Hill Road.
6. The Nash Stream Forest land was purchased with unrestricted public funds from the State of NH and the Federal Government.
7. There are no laws or covenants that prohibit ATV or UTV trails in Nash Stream Forest.

8. There are over 19,000 NH residents that registered OHRV's in NH in 2016. Those residents have just as much right to recreate in Nash Stream Forest as hikers, fishermen, hunters, snowmobilers and camp owners.

9. The current and proposed ATV/UTV trails will not have any impact on the logging operations in Nash Stream Forest.

10. There are 15 miles of gravel roads for public access (camp owners, fishermen, hunters, sightseers, etc.), 47 miles of trails for snowmobile access, 21 miles of trails for hiker access. There are 10.6 miles of current ATV trails and 8.9 miles of newly requested ATV/UTV trails, which is in line with the amount of trails and roads allowed in the plan for other user groups.

11. All of the current and proposed ATV/UTV trails are located along the outer perimeter of the forest, creating no negative impacts on the traditional uses in the heart of the forest. Even though logging trucks, cars, pickups, 4WD vehicles, motorcycles and registered trail bikes can access the heart of the forest by traveling along its gravel roads, there will be no ATV or UTV trails on these roads.

12. Adding up the footprint of all the camps, gravel roads, snowmobile trails, hiking trails and ATV/UTV trails (both current and proposed) equals 528 acres or 1.3% of the forest. In other words, 98.7% of the forest would be left in its natural state, which certainly meets goal "c" listed above. Only 70.7 acres or .18 percent of the forest (less than ¼ of one percent) would be used.

Thank you for your time in this matter,

Jacqueline N. Baker and
Michael T. Biederman
Big Rock Campground Seasonal Site

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 7:03 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Forest

----- Forwarded Message -----

Subject: Nash Stream Forest
Date: Tue, 14 Feb 2017 10:02:15 -0500
From: Jill Holt <holt.jill@gmail.com>
To: feedback@nashstreamforest.com

February 14, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
72 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Jill Holt
68 Hosley Street
Manchester, NH 03103

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 7:06 PM
To: DRED: Nash Stream Plan
Subject: Fwd: FW: scan doc
Attachments: doc01718320170214111530.pdf

----- Forwarded Message -----

Subject:FW: scan doc
Date:Tue, 14 Feb 2017 11:36:56 -0500
From:TM Crane Service <tmclift@comcast.net>
To:feedback@nashstreamforest.com
CC:wannabfarmnh@gmail.com

Support Letter

I e-mailed the letter and will mail hard copy to Mr. Simpkins.
Thanks for the heads up. Let us know when meetings are in Concord.
Our Club didn't let us know.

-----Original Message-----

From: tmclift@comcast.net [<mailto:tmclift@comcast.net>]
Sent: Tuesday, February 14, 2017 11:16 AM
To: tmclift@comcast.net
Subject: scan doc

FS-C2126MFP+
[00:c0:ee:95:1d:93]

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

February 14, 201

Director Brad Simpkins

Attention: Nash Stream Plan

NH Division of Forests and Lands

172 Pembroke Road

Concord, NH 13301

Dear Mr. Simpkins,

Thank you for hosting the public hearing to address potential trails in Nash Stream State Forest. My husband and I are sorry we cannot attend but would like you to know we are in full support of this initiative.

My husband and I have traveled to the area for over fifty years to enjoy the camps at "the bog", hiking, fishing etc.

We are fairly new to the ATV sport and are pleased to see the NH ATV Clubs doing such a wonderful job expanding and caring for the trails we have come to enjoy.

We often stay with friends in Stark to ride our side by side. I would love to see any trail developed which would take our ATV's off the roads. Road travel is not pleasant and in my opinion should only happen in short sections to connect trails.

You know the disparaging statistics concerning ATV access vs. snowmobilers, hikers, fishermen, hunters and camp owners to the recreational areas. This sport is growing and enjoyed by all ages and by whole families together. (Also our pets.)

Public access has always been a high priority for our Public Lands. This is a perfect opportunity for a public/private initiative. The ATV Clubs have amazing members, all very sensitive to our environment and precious natural resources. They provide education, and have amazing willingness to care for and develop trails.

The ATV population could be counted as a great resource in itself. Please allow this sport to grow.

The Nash Stream Forest should be opened to everyone.

Thank you for your consideration of this matter.

Respectfully,

Merrill and Carol Johnson

60 Cross Road

Hooksett, NH 03106

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 14, 2017 7:07 PM
To: DRED: Nash Stream Plan
Subject: Fwd: ATV Trails Access- Nash Stream
Attachments: Nash Stream- ATV.docx

----- Forwarded Message -----

Subject: ATV Trails Access- Nash Stream
Date: Tue, 14 Feb 2017 12:00:01 -0500
From: Jan Hendriks <janh@hydraproof.com>
To: feedback@nashstreamforest.com

To Whom it May Concern:

Attached is a letter in support to opening up ATV trails in Nash Stream State Forest.

Thanks,

Jan Hendriks

February 14, 2017

Director Brad Simpkins

Attention: Nash Stream Plan NH Division of Forests and Lands

172 Pembroke Road

Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Jan Hendriks

Guinn, William

From: Ray St.Onge <raystonge58@gmail.com>
Sent: Wednesday, February 15, 2017 8:23 AM
To: DRED: Nash Stream Plan
Subject: nash stream forest draft management plan revision

In regards to the revision plan of continuing the use of the west side road and Kelsey notch, I have no issues continuing the use of these access points.

My wife and I are camp owners in the nash stream forest and our camp is located within a thousand feet of the west side rd. and we do not feel that ATV/UTVS are a nuisance to us, We feel that the pilot program has proven that there is more then enough acreage of forest to accommodate all enjoyment of this beautiful forest. These access points are on the outside perimeters of the nash forest.

I commend Maggie Machinist and her department for doing a great job managing the states northern forest..

Ray & Janet St.Onge

Guinn, William

From: Claudette Boutin <reclaud@ne.rr.com>
Sent: Wednesday, February 15, 2017 10:31 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream

would like to keep trails open and add connector trail .
Rene G. Boutin
Gorham N.H.

AV atv club Berlin N.H.

Guinn, William

From: Claudia Damon <cordsdamon@gmail.com>
Sent: Wednesday, February 15, 2017 8:43 PM
To: DRED: Nash Stream Plan
Subject: Comments

Hello,

I wish to comment on the Nash Stream (State) Forest Draft Management Plan Revision.

I don't want to needlessly reiterate what others have said and written, so I want you to know that I wholly support the comments made by the Society for the Protection of New Hampshire Forests.

I believe the right course of action for DRED to take in the new management plan for Nash Stream is to **limit ATV use over the next plan period to the two trails that now exist. No new trails** should be established.

Nash Stream Forest must by law be managed over the long-term based on the original intent behind the State's purchase. Specifically, that intent is to protect the entire Nash Stream watershed as an ecologically intact working forest and to reserve for the public the traditional recreational uses of what had long been privately owned and managed forest land.

Sincerely yours,
Claudia C. Damon
64 Fisk Road
Concord, NH 03301

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Thursday, February 16, 2017 8:10 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Plan

----- Forwarded Message -----

Subject: Nash Stream Plan
Date: Thu, 16 Feb 2017 01:59:13 +0000
From: Erin ransford <pleasantvallie@hotmail.com>
To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>
CC: E Harlan Connary <harlan.connary@gmail.com>

February 17, 2017

Director Brad Simpkins
Attn: Nash Stream Plan
NH Division of Forests & Lands
172 Pembroke Rd
Concord, NH 03301

Dear Mr. Simpkins,

We are writing to voice our support of ATV trails in the Nash Stream State Forest.

While we are not current residents of New Hampshire, we are land owners in Stratford, NH and members of North Country ATV. We spend most of our weekends there during the ATV riding season.

The Nash Stream land was purchased to provide recreation for many types of visitors, which should include ATV riders, as there are no laws prohibiting them. The land was also purchased with the intent protect its natural beauty and since the current and proposed ATV trails are on the outer perimeter of the forest, there would be no environmental effect. Also percentage wise, a very small portion of the forest would be used by ATVs especially in comparison to other vehicles that are traveling on the gravel roads throughout the heart of the land.

More and more people are enjoying ATV riding. They are looking for trail systems where they can spend the entire day on the trails, which means they need to be able to ride from one town to another to access fuel and food. They want to explore as many trails as they can, but without having to trailer from one area to another. Please keep the West Side and Kelsey Notch trails open and consider opening more trails in the Nash Stream Forest that could provide access to fuel, services and other towns.

Sincerely,

Scott & Erin Ransford

184 Park Rd

Pleasant Valley, CT 06063

477 Bog Rd

Stratford, NH 03590

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Thursday, February 16, 2017 8:25 AM
To: DRED: Nash Stream Plan
Subject: Fwd: FW: Nash Stream Letter - M. Theriault
Attachments: Nash_Stream_Ltr_-_M.Theriault.pdf

Please see attached PDF file with letter on the Nash Stream Plan.

----- Forwarded Message -----

Subject:FW: Nash Stream Letter - M. Theriault
Date:Thu, 16 Feb 2017 08:21:05 -0500
From:larry@twolakeslodge.com
To:feedback@nashstreamforest.com

February 15, 2017

Director Brad Simpkins
Attention: Nash Stream Plan NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. Our family of five, camps seasonally at Connelly Campground in Stratford. Our boys range in age from 3 to 17 and they all LOVE riding the trails. It truly is such a great and fun family sport and we are building so many memories with our kids on the trails. One of our favorite trails is the West Side Trail, which is so peaceful and beautiful to ride on. The kids are always looking for deer or moose as we love and respect the wildlife that lives in the forest.



A new Southern Connector trail is in great need so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. We have several friends with camps in Stark and we love to go visit them but, it is not very enjoyable riding on pavement.

As you know, this land was purchased with public funds and I would hope that it could be opened to all for recreation enjoyment. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.



I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is very upsetting to me. ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and these riders should be allowed access across Nash Stream Forest for services and to be able to travel from one town to the next. My family and our friends are all very respectful and safe on the trails and understand that it is a privilege to ride on them, so I do hope there will be more trails in the coming years for us to all enjoy.

Thank you for taking time to read this letter. I hope you are able to support the addition of these critical trails for future ATV use.

Sincerely Yours,

Meghan Theriault

Meghan Theriault
162 Mount Delight Road
Epsom, NH 03234



Guinn, William

From: Pat Kellogg <pk@kelloggsurvey.com>
Sent: Thursday, February 16, 2017 5:11 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Management Plan

To Whom It May Concern:

I support a call for the withdrawal of the proposed plan for the Nash Stream Forest Management Plan, and urge a proper public process that will update the excellent, ecologically-centered 1995 Plan so that the revised plan effectively addresses climate change.

Specifically, to protect the entire Nash Stream watershed as an ecologically intact working forest and to reserve for the public the traditional recreational uses of what had long been privately owned and managed forest land. Also I support the limitation of future ATV use of the Forest to the two established trails, the permanent West Side Trail and the three-year Kelsey Notch Trail.

Thank you for your consideration.

Patricia Kellogg
Littleton, N.H.

Guinn, William

From: Bill Demers <demerwl@gmail.com>
Sent: Thursday, February 16, 2017 8:42 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest comment.

Thank you for hosting a public input session in Whitefield.

The original forest plan didn't include OHRV's because I don't believe they were very popular back then, but the original committee members saw to it, to include snowmobiles. I think had OHRV's been popular back then, they would have included them as well.

I believe the Nash Stream Forest is large enough for ALL uses.

I hunt, hike and ride OHRV's and snowmobiles, they all fit!

Thank you for taking emailed comments!

Bill Demers
136 Raycrest Dr.
Randolph, NH 03593

DEMERWL@GMAIL.COM



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Guinn, William

From: Jamie Sayen <jrcs.triton@gmail.com>
Sent: Friday, February 17, 2017 12:04 PM
To: DRED: Nash Stream Plan
Subject: Jamie Sayen's Comments on NSF Draft 2.16.17

Hi Will,

I did not have a clean copy of my comments last night. I am attaching a copy, and I intend to submit more in-depth comments before March 3.

Thank you,

Jamie

COMMENTS FROM JAMIE SAYEN

ON 2017 DRAFT REVISION OF NSF MANAGEMENT PLAN

I am Jamie Sayen from Stratford. I participated in the writing of the 1995 Management Plan that is still operative. It declared: "The Management of NSF will be a model of environmentally sound public land stewardship." (page 61) A public lands management plan must provide services that are not reliably provided by private landowners.

The 1995 Plan emphasized the need to protect the ecological integrity of the Forest, and directed forest managers to "focus on long rotation, uneven-aged techniques producing stands with big trees and many vegetative layers (high vertical stand diversity)." (p. 87) While permitting clearcuts, it made repeated statements strongly advising against such heavy impact practices.

Today, the greatest environmental threat in human history, human-caused climate change, threatens our forests. Sugar maple, moose, red spruce, loons may not survive another century in NH. Forests sequester as much carbon as oceans. The oldest forests sequester the most carbon. Spruce and Maple can live 300 or more years. Following the 1995 Plan's commitment to protecting big old trees and ecosystem integrity, the NSF must maximize its carbon sequestration capacity.

Not only is the 2017 Draft silent on the NSF's carbon sequestration potential and the threats posed by climate change, it deletes the strong directives of the 1995 Plan. It desires more clearcuts and an artificially young forest that is roughly half composed of seedling, sapling and poletimber, with few trees older than 100. Instead of sequestering

carbon, clearcuts release it from trees and soils. This Draft exacerbates the climate change crisis.

The 2017 Draft was not written by a representative public committee, but by the very managers whose activities will be governed by the Plan. This is a usurpation of the public's role and an unacceptable conflict of interest. The chairman of the 1995 Plan committee, the Reverend Stephen Blackmer, testified in Concord that the 2017 Draft threatens to seriously undermine the ecological intent of the original plan.

For 20 years, the NSF Managers have failed to implement a vitally important directive to establish 100-200 acre hardwood and 1500 acre softwood control areas essential to monitoring the ecological impacts of logging. After 15 years of AVT use, there still are no monitoring studies of the ecological impacts of ATVs, particularly on streams painstakingly restored by Trout Unlimited. In the absence of effective monitoring those activities must be suspended

This plan must be withdrawn;

- A new broadly representative revision committee must begin anew with the 1995 Plan as the text to be revised. Delay is the price of producing an unacceptable first draft revision.

- Objective documentation of the need to revise must be supplied for each proposed revision.

- The Revision must address climate change and strengthen ecosystem protections.

Guinn, William

From: Simpkins, Brad
Sent: Friday, February 17, 2017 1:14 PM
To: DRED: Nash Stream Plan
Subject: FW: Nash Stream Plan comments
Attachments: Nash Stream Draft Management Plan ASNH Comments 2.16.2017.pdf; Guidelines for Managing Canada Warbler Habitat in the Northeast and Mid-Atlantic Regions - 2017 (2).pdf; Guidelines for Managing Rusty Blackbird Habitat in New York and Northern New England - 2017 (3).pdf

Sent with Good (www.good.com)

From: Carol Foss <cfoss@nhaudubon.org>
Sent: Friday, February 17, 2017 1:01:29 PM
To: Simpkins, Brad
Subject: Nash Stream Plan comments

Hi Brad,

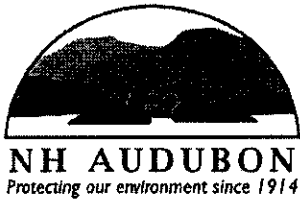
Please find attached my comments on the Draft Nash Stream Forest Management Plan on behalf of ASNH. I have also attached habitat management guidelines for Rusty Blackbird and Canada Warbler. Hard copies are en route by snail mail.

Sincerely,
Carol

Carol R. Foss, Ph.D.
Senior Advisor for Science and Policy

Audubon Society of New Hampshire
84 Silk Farm Road
Concord, NH 03301

603-224-9909 Ext. 331



STATEWIDE OFFICES

84 Silk Farm Road
Concord, NH 03301
Phone 603-224-9909
Fax 603-226-0902
nha@nhaudubon.org
www.nhaudubon.org

REGIONAL CENTERS

AMOSKEAG FISHWAYS & LEARNING CENTER

Fletcher Street
P.O. Box 330
Manchester, NH 03105
Phone 603-626-3474
Fax 603-644-4386

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Game Department, and the US
Fish & Wildlife Service.*

MASSABESIC CENTER

26 Audubon Way
Auburn, NH 03032
Phone 603-668-2045

MCLANE CENTER

84 Silk Farm Road
Concord, NH 03301
Phone 603-224-9909

NEWFOUND CENTER

50 North Shore Road
PO Box 142
Hebron, NH 03241
Phone 603-744-3516

Director Brad Simpkins
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

16 February 2017

Dear Director Simpkins,

I appreciate the opportunity to provide comments on the Draft Nash Stream Management Plan on behalf of the Audubon Society of New Hampshire. We were surprised and concerned to see that the Draft includes changes to the Management Vision and Principles. Having been involved in the Nash Stream Technical Team back at the time of State acquisition, it had been my understanding that the Vision and Principles were to remain sacrosanct, sort of like the U.S. Constitution, while the remainder of the Management Plan would be reviewed and revised periodically to best implement the Vision and Principles as conditions changed over time. The original wording of the Vision and Principles reflect an exhaustive (and exhausting!) public process that worked hard to develop consensus among many, diverse stakeholders. While it is easy to envision ways to "improve" on this language (with or without altering the original intent) more than 20 years after the fact, we believe that the original language was intended to guide management for the coming centuries, not just a few decades into the future. We urge you to restore the original Vision and Principles, and ensure that management adheres closely to those concepts.

Specific comments and suggestions follow.

3.2.4 Utility Corridors, 3.2.4.2. Power Line Easement- Portland Natural Gas (p.28)

This is actually a pipe line easement, rather than a power line easement. To follow the standard description for other easements, the width of the easement should be provided.

4.1.1 Topography and Bedrock Geology (p. 29)

It would be useful to include a map of the three major bedrock units.

4.2.1 Vegetation Patterns and Natural Communities

Lowland spruce-fir (p.32)

Eastern white pine (*Pinus strobus*) has a frequent, but scattered presence in many stands of lowland spruce-fir in Coos County. Given this species' value, both ecologically and economically, it seems worthy of mention here. If it is truly absent from the Nash Stream Forest, one suspects that would be the case as a result of past timber practices rather than natural conditions. I haven't been on Nash Stream Forest for a while, but I seem to remember some pine over east of the Percy Peaks. I think that may have been in more of a mixed forest.

4.2.2 Rare Plant Species

Seems like it would be worth including a list of additions to the state rare plant list that could potentially occur on the Forest given latitude, elevations, and available habitats.

4.2.3. Natural Areas

Will the final plan include a map of the five natural areas/preserves?

4.2.4 Invasive Plant Species

Common reed (p. 37) Unlike glossy false buckthorn and Japanese knotweed, there is no discussion of whether or not this occurs on NSF. If not, it would be worth mentioning the distance from the nearest colony to Nash Stream Bog. A major infestation would present a significant threat to the ecological health of the Bog.

It seems like purple loosestrife (*Lythrum salicaria*) is another species that could potentially impact the Bog. Perhaps worthy of mention?

Objective 3. (p.38)

I strongly recommend including some mention of a management plan as part of this objective. This may be as simple as referencing a manual for invasive species control on other state lands, but the NSF plan needs to include some kind of guidance for control measures, should they become necessary, not just inventory and monitoring.

Table 4. Amphibian and Reptile Species Known or Expected to Occur in NSF. (p. 51)

Eastern ribbon snake (*Thamnophis sauritus*) should be included as expected. I have photographed one in Dixville.

Table 5. Birds Documented in NSF During Breeding Season (pp. 51-53)

Table 11 mentions Northern Goshawk activity in the lower Nash Stream valley and the vicinity of Nash Bog, but it not included in Table 8. The wood thrush is included in Table 8 but not in Table 5.

Table 6. Bird Species Not Yet Documented Which May Occur in the NSF During the Breeding Season

Table 7. Bird Species Which May Occur in the NSF as Migrants, Transients, or Winter Visitors
I suggest moving Merlin and Osprey from Table 7 to Table 6, adding Wild Turkey, Eastern Kingbird, Song Sparrow, and White-winged Crossbill to Table 6, and adding Bald Eagle and Solitary Sandpiper to Table 7.

Table 9. Mammals known and likely to occur on NSF (p.56)

Short-tailed shrew (*Blarina brevicauda*), Deer mouse (*Peromyscus maniculatus*), and Red-backed mouse (*Clethrionomys gapperi*) should be added to the list of other mammals likely to occur.

Species of Management Concern (p. 57)

Criteria for primary targets should include species of greatest conservation need in Wildlife Action Plan in first bullet.

Table 11. Target species of management concern with preferred habitat and management recommendations.

Habitat management guidelines (attached) have recently become available for Canada Warbler and Rusty Blackbird. In Preferred Habitat block for Rusty Blackbird, edit to "... with **young or stunted** spruce-fir forest..." In the Habitat Availability in NSF block, I would be inclined to replace the current text with "vicinity of beaver flowages associate with Columbia Brook, East Branch, Nash Stream, and Bag Hill area."

Wildlife Goals, Strategies, and Implementation

Objective 1. Assess and continue to monitor high priority (i.e., primary target) vertebrate and selected invertebrate populations, and identify opportunities to carry out high priority wildlife research in the NSF.

Implementation: Include Rusty Blackbird in examples provided in last bullet.

Objective 2: Work towards the flowing desired future condition for forest and non-forest structure and composition to provide suitable habitat for the entire suite of primary and secondary target species. In second paragraph, it would be appropriate to add after the Ruffed Grouse et al. sentence: "Rusty Blackbirds nest in dense, regenerating spruce-fir forest.

Objective 3. Land managers will consider and incorporate management recommendations for primary and secondary target species of management concern for timber sales, noncommercial habitat projects, and public recreation projects.

Strategies. 1. Add "and available regional habitat guidelines for primary target species."

Objective 4: Develop new standards for forest resource inventory that will allow analysis of within-stand features important to primary and secondary target species.

Eliminate rusty blackbird from list of species to which understory and midstory cover are important.

FISHERIES – I have refrained from dealing with typos throughout, but assume someone has already picked up on this one!

7.2.2.2. Sawtimber

A more comprehensive species-specific discussion would be useful here.

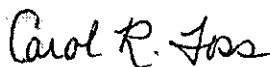
Goal: Manage Nash Stream Forest and its timber resources to achieve continuous yield of wood products from an ecologically sustainable forest.

Objective 3: Implement procedures to achieve and maintain a healthy and ecologically sustainable forest and timber resource.

I would like to see a strategy such as "Explore opportunities to increase white pine distribution and abundance on the NSF."

Thank you for the opportunity to comment on the draft plan. Again, I urge you to restore the original Vision and Principles language. I look forward to the finished product!

Sincerely,



Carol R. Foss

Senior Advisor for Science and Policy

Guinn, William

From: Becky Merrow <merrowbecky223@gmail.com>
Sent: Friday, February 17, 2017 1:22 PM
To: DRED: Nash Stream Plan; zee223@hotmail.com
Subject: Discriminatory Practices At Silver Brook Camp

This letter is with regard to Silver Brook Sportsman Association -- a "private camp" at Nash Stream State Forest.

Since at least 1989, I was a "member" of this association by virtue of being married to a member. Upon my divorce in 2009, I have contacted the association on numerous occasions seeking an application for membership in my own right. The association has never responded to me.

Since then, I understand new bylaws have been created. To my knowledge, the bylaws are not made public. I understand the bylaws allow for passage of membership to sons of current members--but not to daughters. If this is correct, my granddaughter, Maggie Lorraine Newton, will never be able to be a member in her own right..

It seems that Silver Brook Sports-MEN association is just that--for MEN. Boys only--girls need not apply.

In the late 1800's when the camp was built, this practice may have been appropriate. However, in the year 2017 this is unacceptable. It may not only be unacceptable, it may be illegal.

It is true--private clubs can restrict their membership to just about anyone. However, since the State has purchased the land and otherwise licenses the camps, there is a nexus of government involvement here. Doesn't the State pledge not to discriminate based on sex/gender? Isn't this a violation of State housing law? It just doesn't seem right. Your response is appreciated.

Becky Merrow

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Saturday, February 18, 2017 10:08 AM
To: DRED: Nash Stream Plan
Subject: Fwd: ATV Trails

----- Forwarded Message -----

Subject: ATV Trails
Date: Thu, 16 Feb 2017 21:10:16 -0500
From: Lisa Brahn <hurleyl1011@yahoo.com>
To: feedback@nashstreamforest.com

My husband and I come to the ride the wilds trail system. We have been coming every year for the last three years. When we come we ride from Berlin to Pittsburg. We stay in cabins and inns through the trail system. We eat and local restaurants and purchase gas. We range every year at least \$4,000.00 dollars and stay around 10 days. This is only 1 couple. I can't imagine how much this brings for over 6,000 people. If you take away the trails we can't come spend our money and bring it to your towns. We appreciate the beauty of land and respect it. We love the "Live free or die" country!

Don't take it away... Please!

Jim and Lisa Brahn

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Sunday, February 19, 2017 1:20 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Plan

----- Forwarded Message -----

Subject: Nash Stream Plan
Date: Sun, 19 Feb 2017 10:42:17 -0500
From: Holly Van Hirtum <hollyavh@gmail.com>
To: feedback@nashstreamforest.com
CC: Holly <hollyavh@gmail.com>, Chris <cvanhirtum@gmail.com>, Nicholas <Nickdionne82@gmail.com>, Chrissie Dionne <chrissiedionne@comcast.net>, Mom & Dad <dbdionne@comcast.net>

Hi my name is Holly and I am a member of the NHATV club. I grew up in an atv riding family and continue the tradition with my own two children and husband. I have been riding for over 30 years and enjoy using the NH rail systems and spending quality outdoor time with my family.

This email is being sent to you because I am supporting keeping the 8 mile West Side ATV trail and the Kelsey Notch ATV Trail as a permanent trail. I am also in support of allowing the construction of a new 1.3 mile Southern Connector ATV trail between the west side trail and the southern boundary of Nash stream forest so that we may gain access to local trails and gas. Having access to the local areas and gas are important not only to the ATV rider but also the local economy. I would also be in support of building a new 6.3 mile east west corridor ATV trail that would run along the southern boundary of Nash Stream Forest and exit onto Percy Road. This would help eliminate the need for traffic passing thru Stark Village. It would also be nice to see a 1.3 mile east west corridor extension ATV trail that would exit onto Bell Hill Rd. In the future.

I am aware that the Nash Stream Forest land was purchased with unrestricted public funds by the state of NH and the Federal Government. There are zero laws or covenants that prohibit our use of ATV's or UTV's in the Nash Stream Forrest. NH had over 19,000 residents that registered OHRV's in 2016. These residents including myself and my family have just as much if a right to use the Nash Stream Forrest as the hikers, fisherman, hunters, snowmobilers and camp owners do. We all can and should be able to enjoy and share the land.

When the Nash Stream Forrest was first purchased it was purchased with

the intent to "ensure that the property continues to contribute to forest economy through the sale of wood products". It was purchased to "provide continued public access for recreation and to protect the area's natural beauty and ecological values".

The current and proposed ATV trails that my family would use will have zero impact on the logging operations. There are 15 miles of gravel roads for public access (hunters, camp owners, fishermen, sightseers, etc.) , 47 miles of trail access for snowmobilers, 21 miles of hiking trails, and there are currently 10.6 miles of ATV trails and 8.9 miles of newly requested trails, which is in line with the amount of trails and roads allowed in the plan for other user groups. All of the current and proposed ATV trails are located on the outer perimeter of the Forrest creating no negative impacts on the traditional uses in the heart of the forest. Even though logging trucks, cars, pickups 4wd vehicles, motorcycles and registered trail bikes can access the heart of the forest by traveling along the gravel roads, there will be no ATV UTV trails on these roads.

With all the gravel roads, trails and proposed trails for all of the different forest uses it only totals 538 acres which is 1.3% of the entire forest. 98.7% of the forest would be left untouched and in its natural state. The actual ATV trails would only use less than .18% of the forest.

I hope we can save the current and proposed ATV trails so that myself, family, friends and all other residents can enjoy these trails for years to come. Having access to these trails means a lot to us and is part of what makes living in NH so great.

Thank you.
Sincerely,
Holly Van Hirtum
Sent from my iPhone

Guinn, William

om: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 20, 2017 9:52 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Trails

----- Forwarded Message -----

Subject: Trails
Date: Sun, 19 Feb 2017 15:51:10 -0500
From: Timothy Celley <coldmthouse@aol.com>
To: feedback@nashstreamforest.com

Hello. We are Tim and Maggie Celley from East Calais VT.

We just wanted to say how much we enjoy ATViing in NH. My folks have a camp in Bloomfield VT and we stay at camp and ATV in NH.

We have spent hundreds of dollars a year in NH. Every year for about the last 4yrs. The ATV clubs in NH. are well organized and do a nice job of maintaining the trail system and respecting the land that they cross. We have seen very little damage from ATVs on NH. trails. We would like to encourage new development of these ATV trails to include- Southern Connector trail , the East West corridor trail, and the East West corridor Extension ATV trails. We would also like to see the West Side ATV Trail and the Southern Corridor ATV Trail become permanent . We hope ATViing in NH. is being encouraged, because that much natural beauty shouldn't be kept secret.!

Again, we thank you very much for the beauty that NH. can offer from it's ATV trails.

Sincerely,

Tim and Maggie Celley

Guinn, William

From: Lisy Meyers <billisy44@gmail.com>
Sent: Monday, February 20, 2017 1:41 PM
To: DRED: Nash Stream Plan
Subject: Revision to Forest Plan

You asked for public input.
I am suggesting that no ATV or UTV use be allowed.
Logging should be cut back.
Gravel permits denied.

There are few areas where pedestrians and wildlife feel safe. Protect Nash Stream from further destructive "maintenance".

Mr. & Mrs. William Meyers
194 Kimball Lane
North Haverhill, NH 03774

Guinn, William

From: David Brooks <moose3d@gmail.com>
Sent: Tuesday, February 21, 2017 6:21 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream

I fully support additional trails to be opened in Nash Stream area. It supports local small businesses in the North Country and as stated are located on the outer boundaries not through the interior. The Nash Stream area is for EVERYONE, not just a few.

Sincerely,

Guinn, William

From: Megan Johnson <megejohnson@gmail.com>
Sent: Tuesday, February 21, 2017 11:42 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan public comment

I am concerned that the Nash Stream Forest Proposed Plan Revision, in its changes to forestry management and expansion of OHRV trails, has abandoned the ecological priorities of the original plan. Please consider the impact of these changes and revise the plan to reflect the original purposes of the Nash Stream Forest. OHRV users have an abundance of trails in Northern New Hampshire; the trails do not need to be expanded and the users do not need to be protected. Our environment, however, *does* need protection and thoughtful management in the form of an ecologically sound plan based on current environmental science and local studies.

Motorized recreation is a trail use that is not compatible with non-motorized trail use. My recreation opportunities as a mountain biker, trail runner, and hiker are limited and threatened by this rapid OHRV expansion, as well as expansion that clubs desire for the future. I implore the plan writers to pause and closely study the true human and environmental impacts of OHRV expansion in Berlin/Gorham before rushing to open more trails in the Nash Stream Forest.

On a final note, I moved to northern NH 7 years ago for its close communities and undeveloped land. In that time I have seen an explosion of OHRV recreation in the Berlin/Gorham area, transforming the small town to a place that, for many months out of the year, is unrecognizable and unpleasant to be in. My fiancée and I now live in Lancaster and avoid going to Gorham in the summer and fall. We both work in northern NH and plan to raise a family here. If Lancaster is compromised in a similar way to Gorham, and if our opportunities for quiet recreation are gradually eroded by expanding OHRV use, we will be driven to make our future somewhere else.

--

Megan Johnson
603-723-4342

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Tuesday, February 21, 2017 3:39 PM
To: DRED: Nash Stream Plan
Subject: Fwd: nash stream and ride the wilds

----- Forwarded Message -----

Subject: nash stream and ride the wilds
Date: Tue, 21 Feb 2017 20:23:27 +0000 (UTC)
From: uno single <superball07@yahoo.com>
Reply-To: uno single <superball07@yahoo.com>
To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>

Please open up and keep open the nash stream area for the "ride the wilds" atv trails! atv'ers are just as good about the environment as the snow mobiler's and maybe even more so. atv's cannot ride at night where the sleds can run 24 hours a day. we have been riding the trails as soon as they were opened and many family's have taken up the pastime of atv use as compared to sledding. it has brought tons of money to an area that needs it in the state. please keep this in mind! Thank you, Scott Savard

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, February 22, 2017 9:54 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Fwd: Nash Stream Letter

----- Forwarded Message -----

Subject:Fwd: Nash Stream Letter
Date:Wed, 22 Feb 2017 09:18:28 -0500
From:bloomfieldmarty@aol.com
To:feedback@nashstreamforest.com

Feb. 21, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Linda and Marty Lomasney

Bloomfield, VT

bloomfieldmarty@aol.com

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, February 22, 2017 9:58 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Letter
Attachments: Nash Stream.docx

Please see attached letter

----- Forwarded Message -----

Subject: Nash Stream Letter
Date: Tue, 21 Feb 2017 20:28:40 -0500
From: Tom Casartello <tomcasartellojr@gmail.com>
To: feedback@nashstreamforest.com

Please forward on to the appropriate person.

February 20, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing in support of limited ATV access in Nash Stream State Forest. In addition to continuing the existing West Side and Kelsey Notch trails, I am also in support of the limited additional trails that have been requested by the OHRV community, These include the proposed southern extension from West Side Trail to give riders access to the gas station in Stark as well as the 6.3 mile East-West Corridor D trail being developed along the southern boundary to Percy Road to take ATV traffic off of Stark town roads with the option to eventually extend to Bell Hill Road.

The land was purchased with unrestricted funds with no laws or agreements that prohibit ATV or UTV trails. 19,000 New Hampshire residents registered OHRVs in the state in 2016. Public funds that all taxpayers contribute to were used, and those 19,000 ATV users should have some access to the forest as snowmobilers, hunters, fisherman, hikers, and other groups do.

The proposed trails are along the perimeter of the forest and do not bring ATVs and UTVs into the heart of the forest even though other motorized vehicles do access those areas. Additionally the proposed new trails attempt to use existing gravel roads, trails, and paths wherever possible minimizing new paths through currently undisturbed forest as much as possible. The total requested ATV use is less than ¼ of one percent of the forest and adding the requested ATV trails to other use trails and roads in the forest equals only 1.3% of the forest. 98.7% of the forest would be left in its natural state. Additionally the trails would have no impact on the forest's logging operations:

Although I am not a New Hampshire resident, I am a frequent visitor to the Coos County region and spend many dollars in the region every year because of the OHRV trails.

I hope these requests will be considered.

Thank you for your time,

Thomas Casartello
214 Converse Street, Longmeadow, MA, 01106

Guinn, William

From: Golden Rock Farm <goldenrockfarm@hotmail.com>
Sent: Thursday, February 23, 2017 8:49 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream

Director Brad Simpkins
Attention: Nash Stream Plan

via: e-mail

Dear Mr. Simpkins;

The Northumberland Conservation Committee reviewed the Nash Stream plan at our Jan. and Feb. meetings. We encourage you to allow ATV's on a limited basis. The economy of the North Country has received a tremendous boost with the Ride the Wilds initiative. An east west trail that connects Berlin to Groveton is of vital importance to this trail network. Also the West side trail is an important connection for the trail network along with the connector Kelsey Notch trail at the north end of Nash Stream Forest. We encourage you to work with the ATV clubs and allow ATV trails that are reasonable. We would suggest that the plan be that ATV are allowed in designated area and other areas be designated for more passive recreation. We also would like to see that future ATV use not be banned but that a plan be made to review any future proposals that are worth coming from organized clubs.

Thank you for letting us comment on this plan.

Edwin Mellett, Chairman
Northumberland Conservation Committee

Guinn, William

From: Simpkins, Brad
Sent: Thursday, February 23, 2017 7:36 PM
To: DRED: Nash Stream Plan
Subject: FW: Nash Stream Plans

Sent with Good (www.good.com)

From: Tony <tonybonz68@gmail.com>
Sent: Thursday, February 23, 2017 7:04:41 PM
To: Simpkins, Brad; feedback@nashstreamforest.com; harlan.connary@gmail.com
Subject: Nash Stream Plans

January 24, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, February 24, 2017 3:11 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Plan

----- Forwarded Message -----

Subject: Nash Stream Plan
Date: Fri, 24 Feb 2017 12:41:50 -0500
From: Donna <donna.labounty@charter.net>
To: feedback@nashstreamforest.com

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. My family and I live in MA and have a camp in NH whereby we have direct access to the trails. During the camping season we try to go up every weekend. We love it up there and enjoy the outdoors. Living in MA limits are ability to ride.

In addition to the existing trails, we would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. We would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Thank you

Donna Lasick
87 Lakeside Ave
Webster, MA 01570
802-578-5467

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, February 24, 2017 3:14 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream State Forest ATV Trails

----- Forwarded Message -----

Subject: Nash Stream State Forest ATV Trails
Date: Fri, 24 Feb 2017 11:15:26 -0500
From: Kim Kirk <kim.kirk@bigrockcampgroundnh.com>
To: feedback@nashstreamforest.com

February 24, 2017

Dear Mr. Brad Simpkins,

We are the owners of Big Rock Campground and Cabins in North Stratford, New Hampshire and we are writing to express our support for the ATV trails in the Nash Stream State Forest. Our business is dependent on ATV tourism and any trail closures can and do affect our business directly.

In addition to keeping the current Nash Stream State Forest trails open we would also encourage you to consider a new southern connector trail development so that ATV's can get to the gas station located just south of the Nash Stream Forest. Also, development of an east-west corridor trail to take ATV traffic off of Stark town roads that would increase the safety of our ATV riders.

The Nash Stream Forest land was purchased with unrestricted public funds from the State of New Hampshire and the Federal Government and as such should be open to all types of recreational sports and activities. There are currently no laws or covenants that prohibit ATV/UTV trails in Nash Stream State Forest.

Our understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails, and 21 miles of hiking trails. Given that the total miles of ATV trails being requested is less than 20, it is certainly in line with the amount of trails and roads allowed for other public access use. All of the current and proposed ATV trails are located along the outer perimeter of the forest creating no negative impact on the traditional uses in the heart of the forest. Even though there are gravel roads that travel through the forest and are currently used by logging trucks, cars, pick up trucks, motorcycles, and registered trail bikes, there will be no ATV/UTV trails on these roads.

We hope that you will take into account that ATV riding is a growing sport that contributes economically to northern New Hampshire, and specifically for us, to the struggling economy of Coos County. The ATV sport had over 30,000 OHRV registrations in 2016. Of those registered 19,000 were NH residents who deserve the same access for recreation in the Nash Stream State Forest as do hikers, fisherman, hunters, and snowmobilers. These ATV riders need and would greatly appreciate the ability to have access to the Nash Stream Forest in order to reach businesses and services as well as get from one town to another.

We sincerely appreciate your time and consideration and hope that you will grant ATV riders the same access to the beautiful lands of the Nash Stream Forest as other recreational users currently enjoy.

Gary and Kim Kirk, owners
Big Rock Campground and Cabins
830 U.S. Route 3
North Stratford, NH 03590
603-922-3600

--

Kim
Big Rock Campground
830 US Route 3
North Stratford, NH 03590
1-603-922-3600
info@bigrockcampground.com

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Friday, February 24, 2017 3:16 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Trail closures

----- Forwarded Message -----

Subject: Trail closures
Date: Thu, 23 Feb 2017 19:32:29 -0500
From: Jeremy Proper <jproper33@gmail.com>
To: feedback@nashstreamforest.com

Atvs should be allowed to use Nash Stream trails and there should be more trails opened. Atvs bring a big economic boost to the area, more than hunting, fishing and definitely hiking. The more atv trails NH can offer the more revenue the state will have from registrations and the more revenue local businesses will have from food, gas and lodging sales.

Sent from my iPhone

Guinn, William

From: Simons, Colette - FS <colettesimons@fs.fed.us>
Sent: Friday, February 24, 2017 4:13 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan
Attachments: BRAD SIMPKINS - NASH STREAM PLAN.pdf; UNSIGNED - NASH STREAM PLAN - SIMPKINS.docm

Dear Mr. Simpkins,

Thank you for the opportunity to review and comment on the draft Nash Stream Management Plan. As the agency administering the conservation easement, WMNF is glad to see that the management plan is consistent with the intent of the easement, to assure perpetual public use and protection of the Nash Stream Tract while providing a sustained yield of forest products.

A copy of our official correspondence is attached. A hard copy of the letter was mailed to you at:

Attn Nash Stream Plan
NH Division of Forest and Lands
172 Pembroke Road
Concord, NH 03301

Sincerely,

Colette Simons



Colette Simons
Administrative Officer
Forest Service
White Mountain National Forest
p: 603-536-6204
c: 970-379-6091
colettesimons@fs.fed.us

71 White Mountain Drive
Campton, NH 03223-4272
www.fs.fed.us



Caring for the land and serving people

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File Code: 5440; 1920
Date: February 24, 2017

Brad Simpkins
Director
Attn Nash Stream Plan
NH Division of Forest and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

Thank you for the opportunity to review and comment on the draft Nash Stream Management Plan. As the agency administering the conservation easement, I am glad to see that the management plan is consistent with the intent of the easement, to assure perpetual public use and protection of the Nash Stream Tract while providing a sustained yield of forest products.

The draft management plan is thorough in its consideration and protection of natural and cultural resources. I commend the regular emphasis on inventory and monitoring work to increase our understanding of the resources in the Nash Stream tract and the effects of management on those resources. If there are areas where our staffs could collaborate on monitoring to more effectively answer questions for the region, I would support that wholeheartedly.

I believe the Nash Stream Management Plan provides a balanced approach for allowing some motorized recreational access while meeting other important land management goals for the area. It is important that the established process for review by the technical committee and Council on Resources and Development be followed for all trails that are proposed to determine if they are consistent with the requirements of the conservation easement, Nash Stream Management Plan, and Land Conservation Investment Program (LCIP). As indicated in the management plan, I concur it is critical to continue monitoring of trails and the effects of use on natural and cultural resources to ensure allowed use is consistent with the goals of the conservation easement.

One suggestion for the final plan or future iterations is to consider the benefits of discussing climate change more directly. The draft plan refers to it in relation to information that will be gathered by some inventory, monitoring, and research, which indicates a recognition of the role climate change may play in resource management in coming decades. The plan does not say how the State is currently considering climate change, based on the best available scientific studies, in its management of the area. Nor does it discuss how changing temperatures and precipitation levels, and resulting changes in natural and cultural resources, may affect management activities in the future. For example, on the national forest we increase the size of many stream crossings to accommodate increased stream flows during intense precipitation events.



Brad Simpkins

2

I appreciate all of the hard work that has gone into managing the Nash Stream tract in a comprehensive, sustainable way to meet the goals of the conservation easement, and look forward to continuing to provide assistance and support as needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Clare R. Mendelsohn", with a long horizontal flourish extending to the right.

CLARE R. MENDELSON
Deputy Forest Supervisor

cc: Jen Barnhart, Craig Young

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Saturday, February 25, 2017 9:02 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Atv Trail's

----- Forwarded Message -----

Subject: Atv Trail's
Date: Fri, 24 Feb 2017 19:43:55 -0500
From: Norman Lowden <nlowden2882@yahoo.com>
To: feedback@nashstreamforest.com

Hello,

I ask you to please keep all the Trail's you have open and possibly open more. ATV riding is a hobby as well as a passion of mine. I would imagine that the ATV trails must bring in more money than hunting, fishing and hiking combined. Myself and many people I know love and respect the trails you have and look forward to many more years of riding.

Thanks,
Norm Lowden

Sent from my iPhone

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Saturday, February 25, 2017 9:04 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan

----- Forwarded Message -----

Date: Sat, 25 Feb 2017 00:42:27 +0000 (UTC)
From: kathy rogers <memekathy@yahoo.com>
Reply-To: kathy rogers <memekathy@yahoo.com>
To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>

Dear Mr. Brad Simpkins.

I am writing to you to express my support for the ATV trails in Nash Stream State Forest. These trails are awesome and is one way our family get to enjoy the beautiful forest. In addition to keeping the current Nash Stream State Forest trails open we would like you to consider a new southern connector 'rail development so that ATV's can get to the gas station located just south of the Forest.

The Nash Stream State Forest land was purchased with unrestricted public funds from the State of New Hampshire and the Federal Government and as such should be open to all types of recreational sports and activities.

All the current and proposed ATV/UTV trails are located along the outer perimeter of the forest creating no negative impacts on the traditional uses in the heart of the forest. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

We hope you will take into account that ATV riding is a growing sport that contributes economically to northern New Hampshire, with over 30,000 OHRV registrations in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and to get from one town to another.

Sincerely Yours,

Mike and Kathy Rogers

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Saturday, February 25, 2017 6:30 PM
To: DRED: Nash Stream Plan
Subject: Fwd: RE: Nash Stream Forest Plan

----- Forwarded Message -----

Subject: RE: Nash Stream Forest Plan
Date: Sat, 25 Feb 2017 15:21:49 -0500
From: Heather Mortenson <hmortenson23@gmail.com>
To: feedback@nashstreamforest.com
CC: Heather Mortenson <hmortenson23@gmail.com>

To Whom It May Concern:

The Nash Stream Forest is indeed a unique parcel of land. Since its Acquisition in 1988, representatives from several diverse groups worked together over an 18-month period to negotiate an arrangement which all felt was in the best interest of the land and the people who use it. Their recreation vision, did not specifically include ATV's or UTV's, but they did however include the ATV's cousin, the snowmobile as part of its vision. It is my understanding that the Council on Resources and Development has made a preliminary finding that expanding the ATV trails in Nash Stream Forest **"would not be consistent with the management vision as well as RSA 162-C:6."** As an individual who has spent her life living in New Hampshire snowmobiling and riding ATV's, I disagree with CORD and any other environmental agency that wishes to restrict New Hampshire residents of their inherent right to access these lands for recreation purposes. In support of this matter, I revert back to when the Nash Stream land was acquired by the state through the Land Conservation Investment Program and will examine the governing statute on this matter (NH RSA 162-C:6) along with precedent:

162-C:6 Purpose; Management. –

I. The general court recognizes that in order to maintain New Hampshire's distinctive quality of life, strong economic growth must be balanced with responsible conservation initiatives, and that the history of conservation in New Hampshire has been marked by cooperation among government, business, individuals, and conservation organizations.

History has provided us a window to view the fruits of past cooperatives in that Nash Stream has established 15 miles of gravel roads for public access (ATV's excluded from use of said roads), 47 miles of trails for snowmobile access, 21 miles of trails for hikers, and currently 10.6 miles of ATV trails. It is unclear to me, why CORD is denying ATV trails now, after already deeming ATV's as permissible in the forest. Furthermore, if an abundant 83 miles of forest is accessible to motorized vehicles and hikers, specifically, why are ATV's being denied the same or equal future access? Precedent has already demonstrated that ATV's should be granted access. Furthermore, there are no laws or covenants prohibiting ATV or UTV trails in Nash Stream. Of which, all of the current and proposed ATV/UTV trails are located along the outer perimeter of the forest, and create no negative impact to the heart of the forest. Contrasting this, logging trucks, cars, pickups, 4WD vehicles, motorcycles, and registered trail bikes have been granted access to the heart of the forest, and have larger carbon footprints when compared to ATV's.

In addition, ATVing as recreation and tourism should be as welcomed as snowmobiles and seen as a valuable lifeline to many of our dying communities. Many people in New Hampshire and neighboring states like motorized recreation and come to the North Country to explore. More specifically, over 19,000 New Hampshire residents registered OHRV's in 2016. New Hampshire has a distinct quality of life, and it clearly consists of ATV's now. Therefore, it is within the purpose and management of CORD and NH RSA 162-C:6 and that the ATV trail proposals be granted.

162-C:6 Purpose; Management. –

III. The council shall manage the lands acquired under the former RSA 221-A so as to preserve the natural beauty, landscape, rural character, natural resources, and high quality of life in New Hampshire. The council shall maintain and protect benefits derived from such lands and maintain public access to such lands, where appropriate.

Much can be said with respect to the value of protecting the area's natural beauty and ecological values, while providing continued public access for recreation. Taking this into consideration, and adding up the footprint of all the campus, gravel roads, snowmobile trails, hiking trails, and ATV/UTV trails (both current and proposed) that equals 528 acres out of 39,601 acres total. In the grand scheme of things 1.3% of the forest. Less than 1/4% of the forest would be used by all of the current and proposed ATV trails. In other words, 98.7% of the forest would remain in all of its distinct and natural state of beauty.

To exclude ATV trails would be inconsistent with the management vision as well as the recreation vision. ATV's were not common back in 1988 and have since then become a very common motorized recreation. Since ATV's were not specifically named back in the 1988 collaborative effort, we can infer the intent with listing recreational vehicles was *not* to exclude any but rather to express a general acceptance of motorized vehicles in the forest.

Regards,

Heather Mortenson
31 Dodge Road
Allentown, NH 03275

603-340-0646

Guinn, William

om: Thomas Merredith <wundermere@gmail.com>
Sent: Sunday, February 26, 2017 2:10 PM
To: DRED: Nash Stream Plan
Subject: nash stream management plan

i would like to register my support for limiting ATV access to nash stream, to the currently approved atv trails, with NO trail expansion. nash stream historically didn't allow atv use, there are currently other areas they can utilize (i.e. jericho park), and they clearly can result in environmental damage. although many atv users act responsibly, others do not and go into environmentally sensitive areas. expanding the atv trail network will make this kind of behavior more likely and more difficult to patrol and enforce. thank you for your consideration. laurie wunder.

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 8:36 AM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Forrest trails

----- Forwarded Message -----

Subject: Nash Stream Forrest trails

Date: Sun, 26 Feb 2017 15:58:06 -0500

From: Brad Fyfe <bratfordf@comcast.net>

To: feedback@nashstreamforest.com

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I would like to let you know that I fully support all OHRV recreational access to the trails that is in the Nash Stream Forest. Being an ATV owner myself, I would love to see the Kelsey Notch and West side trails as permanent trails. I also hope to see that the future construction of the east/west Corridor and the Southern Connector atv trails. I hear that it will improve the traffic situation through Stark Village. These trails will give us access to more trails. This will help improve the North Country's economy by giving us access to fuel and food access by the trails. These trails can also aid in access to the forest for Forestry and Wildlife studies as well as emergency access by fire departments in case of a forest fire. OHRV's will not hurt the environment. I've never heard of one causing a natural disaster yet, but they will help boost the economy in Northern NH through increased sales of food, gas, and lodging not to mention the money directly generated for Fish and Game protection from OHRV registrations.

Lets keep this land open for all of its recreational use for future generations.

Thank you ☺

Brad Fyfe

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 8:44 AM
To: DRED: Nash Stream Plan
Subject: Plan Feedback
Attachments: 02272017-Nash Stream Comment.pdf

See attached PDF file.

Joshua B. McCourt
288 Bradford Road
Henniker, NH 03242

February 19, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

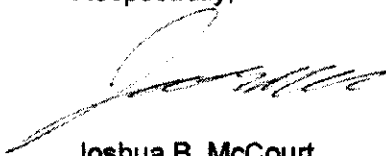
Dear Director Simpkins:

I have recently returned to New Hampshire and love to UTV and snowmobile. To facilitate the enjoyment of UTVing I request that a determination be made to make the 8.0 mile West Site ATV/UTV Trail as a permanent trail, to make the 2.6 mile Kelsey Notch ATV/UTV Trail as a permanent trail, allow the construction of a new 1.3 mile Southern Connector ATV/UTV Trail, allow construction of a new 6.3 mile East West Corridor ATV/UTV trail, and allow for an option for future expansion of a 1.3 mile East West Corridor Extension ATV Trail to Bell Hill Road.

It only seems fair that since the land was purchased with no restrictions for recreational use that the proposed trails are reasonable since they will impact less than the existing uses and provide some access by the ATV/UTV users. The propose use will have less impact on the area than the existing users such as Logging Trucks, Cars, Pickups, 4WD vehicles, motorcycles and registered Trail Bikes since they can access the heart of the area. The proposed trails won't impact logging but will remove a ATV/UTV use from the Village of Stark, connect to local trails and local business. All of this is a win for the area.

The riding of an UTV is a healthy recreational activity and should be supported by the Nash Stream area as it is throughout New Hampshire. Please support this request.

Respectfully,



Joshua B. McCourt

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 8:48 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan
Attachments: 02272017-Nash Stream Comment-JBM.pdf

Please see attached PDF file.

Jennifer B. McCourt
42 Ezekiel Smith Road
Henniker, NH 03242

February 19, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

I am writing to voice my full support the expansion of the ATV trails for Nash Stream area and request that the determination be made to make the 8.0 mile West Site ATV/UTV Trail as a permanent trail, to make the 2.6 mile Kelsey Notch ATV/UTV Trail as a permanent trail, allow the construction of a new 1.3 mile Southern Connector ATV/UTV Trail, allow construction of a new 6.3 mile East West Corridor ATV/UTV trail, and allow for an option for future expansion of a 1.3 mile East West Corridor Extension ATV Trail to Bell Hill Road..

As an avid ATV/UTV rider and snowmobile rider, I feel that the area is comprised of public lands and should be made accessible to ALL recreational uses equally and not discriminate. There are 15 miles of gravel roads for public access (camp owners, fisherman, hunters, sightseers, etc.) 47 miles of trails for snowmobile access, 21 miles of hiking trails for hiker access. The existing ATV/UTV trails include 10.6 miles with an additional 8.9 miles being requested for a total of 19.5 miles. With the requested amount, still is the least of the recreational uses. My opinion is supported by the Goals of the existing Nash Stream Plan in the original purchase document. The trails are on the edges of the Nash Stream area and provide the least impact.

As a full time resident, business owner, and multiple property owner in New Hampshire, I respectfully request that you support the amendment to the Nash Stream Management plan.

Respectfully,



Jennifer B. McCourt

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 8:49 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter
Attachments: 02272017-Nash Stream Comment-RTM.pdf

Please see attached PDF file.

Robert T. McCourt
42 Ezekiel Smith Road
Henniker, NH 03242

February 19, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

I request that the determination be made to make the 8.0 mile West Site ATV/UTV Trail as a permanent trail, to make the 2.6 mile Kelsey Notch ATV/UTV Trail as a permanent trail, allow the construction of a new 1.3 mile Southern Connector ATV/UTV Trail, allow construction of a new 6.3 mile East West Corridor ATV/UTV trail, and allow for an option for future expansion of a 1.3 mile East West Corridor Extension ATV Trail to Bell Hill Road. I have ridden the area with snowmobiles since the inception and believe that ATV/UTV use is a natural extension.

The land was purchased with no restrictions on the recreational uses and all who try to unreasonably deny or restrict a use is unlawfully discriminating. The proposed trails accomplish many benefits, by placing the ATV/UTV use into the woods and away from houses, providing access to commerce for positive economic impact, and access other local trails. The Logging trucks, cars, pick-ups, 4WD vehicles, motorcycles, registered trail bikes can all access the heart of the Nash Stream area where this plan is only asking for the perimeter. The request is reasonable, in concert with the original goals of the purchase of the property and makes an attempt to be non-discriminatory.

I am a resident of New Hampshire, business owner and own multiple properties though out New Hampshire. I appreciate your attention to this matter and hope that all residents of New Hampshire will be able to access this area no matter their preference of vehicle.

Respectfully,

Robert T. McCourt



Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 2:06 PM
To: DRED: Nash Stream Plan
Subject: Support ATV Letter

----- Forwarded Message -----

Subject: Support ATV Letter
Date: Mon, 27 Feb 2017 18:59:33 +0000
From: John J <wyzguy2001@hotmail.com>
To: larry@twolakeslodge.com <larry@twolakeslodge.com>, John J <wyzguy2001@hotmail.com>

02-16-2017

Director Brad Simpkins

Attention: Nash Stream plan

NH Div. Of Forests and Lands

172 Pembroke Road

Concord, Nh 03301

Dear Mr. Simpkins,

I am writing to support the Nash Stream ATV trails. I am a Landowner in Northumberland off Page Hill road which is an Atvtrail. My family and I would really enjoy the east-west trails to be opened from Stark to Milan. This land I believe was purchased with our public/tax payer funds and should be open for all. There are 47 miles of snowmobile trails and 21 miles of hiking trails. The clubs are only requesting 20 miles of Atv trails. I feel that this would also be safer for the younger riders to stay off the roadways. I would be willing to assist with any help with any planning meetings in the future. I am occupied as a public safety officer and a land owner in Northumberland as I mentioned at the beginning. I can be reached at (978 8520104)

Sincerely,

John Janakos

138 Parker Road Chelmsford Ma

Lot 7 Chellie Ln Northumberland, NH

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:51 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 1 of 6
Attachments: 02122017-Attwood Letter.pdf

Please see attached letter in PDF format.

--
Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb. 12, 2017

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is what is wrong with the environmental movement. Use public money to buy land and then shut everyone out but a few privileged hikers.

Nash Stream was purchased with public funds and therefore should be open to ALL user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future. Specifically I would like to see a connector from the West Side trail to the gas station on Northside Road.

I would also like to see an East/West Connector trail that follows the same route as the PT117 snowmobile trail so ATV traffic can go between Groveton and Milan on trails instead of the roads.

With over 19,000 New Hampshire residents riding ATV's, it's time that our public land gets used to fill in the gaps between our private landowner's who have been the most supportive of our sport.

Sincerely

Deana Atwood



1963 River Rd.

Plymouth, NH. 03264

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:52 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 2 of 6
Attachments: 02142017-LeClair Letter.pdf

Please see attached letter in PDF format.

--

Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb. 14, 2017

DRED

172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Plan

Dear Sir or Madam,

I am an ATV rider that enjoys getting out in the woods and sight-seeing. I do not want to see any trails in Nash Stream shut down. In fact, I would like to see more trails developed.

I respectfully request these trails be included in the new plan:

- 1) West Side Trail
- 2) Kelsey Notch Trail
- 3) Establish a new connector trail to allow riders to get from the West Side Trail to the gas station located about a mile SW of the Nash Stream entrance gate.
- 4) Establish a new east-west trail along the southern boundary of Nash Stream forest so riders can get off the roads.

The entire footprint of these ATV trails is around 70 acres or less than ¼ of 1 percent of the 40,000+ acres in the forest. In fact, if you add up all of the trails, roads and camps in Nash Stream it comes to just over 500 acres, which means that over 98% of the forest land would still be open, even with these new ATV trails.

This land was purchased with money from the residents of New Hampshire and should be available to be used by all residents.

Respectful

Donald LeClair



1540 River Rd.

Plymouth, NH 03264

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:52 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 3 of 6
Attachments: 02202017-LeClair Letter.pdf

Please see attached letter in PDF format.

--
Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb 20, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

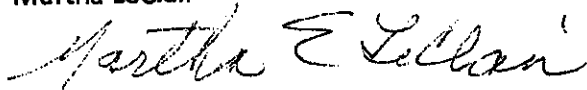
This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another. I am a female rider and look forward to sharing this great area.

Sincerely Yours,

Martha LeClair



1540 River Rd.

Plymouth, NH 03264

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:53 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 4 of 6
Attachments: 02212017-Petersen Letter.pdf

Please see attached letter in PDF format.

--

Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb. 21, 2017

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is what is wrong with the environmental movement. We use public money and then it's closed for public use.

Nash Stream was purchased with public funds and therefore should be open to ALL user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future. Specifically I would like to see a connector from the West Side trail to the gas station on Northside Road.

I would also like to see an East/West Connector trail that follows the same route as the snowmobile trail so ATV traffic can go between Groveton and Milan on trails instead of the roads.

Thank you for your time

Erin Petersen

1321 Winona Rd

New Hampton, NH

03256

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:54 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 5 of 6
Attachments: 02242017-Irzyk Letter.pdf

Please see attached letter in PDF format.

--
Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb. 24, 2017

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is what is wrong with the environmental movement. Use public money to buy land and then shut everyone out but a few privileged hikers.

Nash Stream was purchased with public funds and therefore should be open to ALL user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future.

Almost 20,000 New Hampshire residents are riding ATV's. It's time that some of our public land is used for this great sport, which has such a large economic impact to the North country.

Sincerely yours



Phyllis Izzyk
1963 River Rd
Plymouth, NH
03264

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 5:54 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter 6 of 6
Attachments: 02242017-Pease Letter.pdf

Please see attached letter in PDF format.

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Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Feb. 24, 2017

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is what is wrong with the environmental movement.

Nash Stream was purchased with public funds and therefore should be open to ALL user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future. Specifically I would like to see a connector from the West Side trail to the gas station on Northside Road. New Hampshire residents should have the ability to share some of our public lands along with other user groups.

Sincerely,



13 Gilman St
Franklin NH
03235

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Monday, February 27, 2017 6:10 PM
To: DRED: Nash Stream Plan
Subject: Copies Comments made at Public Input Sessions
Attachments: Public Meeting One Input.pdf; Public Meeting Two Input.pdf

Hi Brad,

I handed in hard copies of my input at the two public hearings and also wanted to provide them to you in electronic form.

See attached PDF documents.

Regards,

Larry Gomes
Nash Stream OHRV Task Force
NH Off-Highway Vehicle Association

Input for Nash Stream Forest Plan

Larry Gomes – Nash Stream OHRV Task Force

February 9, 2017

My name is Larry Gomes and I am the designated spokesperson for the Nash Stream OHRV Task Force, which represents the New Hampshire Off-Highway Vehicle Association – a state-wide organization consisting of 21 OHRV clubs; the North Country OHRV Coalition consisting of 17 organizations made up of local OHRV clubs, snowmobile clubs and Chambers of Commerce and also known as the founder of the Ride-the-Wilds trail network; the Metallak ATV club on the north side of Nash Stream Forest; the North Country ATV club on the west side of Nash Stream Forest and the Milan Trail Huggers ATV club on the south side of Nash Stream Forest.

As a long-time visitor to Nash Stream Forest, I have the utmost respect for what was done to purchase and preserve this property. As a hiker, I have enjoyed the vistas from Sugarloaf and Percy Peaks. I have taken family members to wade through the pools at Pond Brook Falls. In the winter, I have shared many picture perfect snowmobile rides through the Nash Stream trails with family and friends.

As a volunteer with the Groveton Trailblazers snowmobile club, I helped build many of the bridges and performed maintenance on the trails that wind through the forest. I also initiated and lead a four-year long effort to install over 600 sign posts on the trail system to keep trail signs off the trees in the forest. My wife and I spent two years building 60 carved wooden signs that are put up each winter in the Forest directing snowmobilers to their destinations. So Nash Stream Forest is a special place for me, my family and my friends and we care deeply about its future.

When you look at a map of central Coos County with an outline of the boundaries of the Nash Stream Forest, you cannot help but be struck by its size. From south to north the forest stretches over 15 miles, from Rt.110 in the south to within 1.6 miles of Rt. 26 in the north. It is impossible to go from east to west without crossing through this great forest. This presents a challenge of accommodating public use while still preserving the character of the forest.

I believe there is a solution that meets both of these goals and it was pioneered by others before me with the establishment of ATV trails along the perimeter of Nash Stream Forest.

In the north, the Kelsey Notch ATV trail runs along existing logging roads and snowmobile trails within a mile of the northern-most forest border. In the west, the West Side ATV trail runs along existing logging roads and snowmobile trails within a mile and a half of the western-most border.

In the south, we have proposed three ATV trails. The Southern Connector trail would run 1.3 miles along an existing snowmobile trail and would allow riders on the West Side ATV trail to reach gas and lodging services located south of Nash Stream Forest.

The East West Corridor trail would run 6.3 miles along the southern border of Nash Stream Forest following several existing snowmobile trails and old logging roads. Only 4,563 feet of this proposed trail (or 3.1 acres) would run through undisturbed land.

The third and final trail we are requesting is the East West Extension which would run along an existing snowmobile trail to the eastern border of the forest.

By keeping these trails along the outer perimeter of the forest (as shown in the map that I passed out), we are able to accommodate the need for critical trail connections between Groveton and Milan while still preserving the heart of the forest for traditional uses.

Please note that the public use footprint on Nash Stream Forest is actually very small. Adding up all of the camps, gravel roads, snowmobile trails, hiking trails, current and proposed ATV trails yields a footprint of 528 acres or 1.3% of the 43,560 acres of NSF land. In other words, if all three of the proposed ATV trails are approved, 98.7% of the forest land would still remain in its natural state.

Of this 528 acres, just 70.7 acres or 16 one-hundredths of one percent of total forest land would be used for ATV trails. And this is really double counting because almost all of these ATV trails were established along existing gravel roads or snowmobile trails that were already in place before the ATV trails were opened.

In closing I would like to leave you with these thoughts. The purchase of Nash Stream Forest was made with unrestricted public funds that came from people from all walks of life. Some were young, some were old, some were able bodied and some were disabled. There were no wheeled vehicle restrictions placed on the forest by either the state or the federal government at the time of its purchase. But one of the goals clearly stated when the land was purchased was that the land must remain open for public recreation.

The citizens of New Hampshire own this land and they pursue many different forms of recreation including hiking, fishing, hunting, camping, boating, dog sledding, cross country skiing and snowmobiling. In addition, there are over 19,000 New Hampshire residents that also enjoy ATV riding.

Private landowners on three sides of the Forest have stepped up to allow trails on their land creating the critical connectors between several towns that are so important for local small businesses to survive. The state must also do their part by allowing these ATV trails to cross over public land.

We ask that the Nash Stream Tech Committee and the Nash Stream Citizens Committee make the two existing ATV trails in Nash Stream Forest permanent. We also ask that provisions be made in the plan so that the three proposed ATV trails along the southern boundary of the Forest can move forward over the next few years.

Input for Nash Stream Forest Plan

Larry Gomes – Nash Stream OHRV Task Force

February 16, 2017

My name is Larry Gomes and I am the designated spokesperson for the Nash Stream OHRV Task Force, which represents the New Hampshire Off-Highway Vehicle Association – a state-wide organization consisting of 21 OHRV clubs; the North Country OHRV Coalition consisting of 17 organizations made up of local OHRV clubs, snowmobile clubs and Chambers of Commerce and also known as the founder of the Ride-the-Wilds trail network; the Metallak ATV club on the north side of Nash Stream Forest; the North Country ATV club on the west side of Nash Stream Forest and the Milan Trail Huggers ATV club on the south and east sides of Nash Stream Forest.

We have reviewed the draft Nash Stream Forest Plan and have the following six recommendations:

- 1) Change the terminology in the plan from ATV/UTV to OHRV which would be in keeping with OHRV as defined in Chapter 215-A of New Hampshire law.
- 2) Include the West Side trail as permanent OHRV trail with a "designated trail" status.
- 3) Include the Kelsey Notch trail as permanent OHRV trail with a "designated trail" status.
- 4) Include provisions for a 1.3 mile long Southern Connector OHRV trail which would connect the West Side trail to the southern boundary of the Nash Stream Forest allowing access to local services and other trails.
- 5) Include provisions for a 6.3-mile East-West Corridor OHRV trail which would take OHRV traffic off the Stark Road system bypassing the historic center of Stark and the village of Percy.
- 6) Include provisions for a 1.3-mile East-West Extension OHRV trail which would follow the existing snowmobile trail to the eastern boundary of Nash Stream Forest.

As shown in the accompanying map, all of these current and proposed OHRV trails are along the outer boundaries of Nash Stream Forest, preserving the interior of the forest for traditional uses.

Note that there are two gravel roads that allow visitors access to the 91 camps located along the old Nash Bog and the Trio Ponds areas of the forest. These roads can be traveled by any registered road vehicle including cars, 4-wheel drive trucks or motorcycles, but they will not be used by OHRV's.

Adding up all of the camps, gravel roads, snowmobile trails, hiking trails, current and proposed OHRV trails, there is a public footprint of 528 acres or 1.3% of the 43,560 acres of NSF land. In other words, if all three of the proposed OHRV trails are included in the plan, 98.7% of the forest land would still remain in its natural state.

Of this 528 acres, just 70.7 acres or 16 one-hundredths of one percent of total forest land would be used for the existing and proposed OHRV trails. For almost their entire distance, these three proposed OHRV trails follow existing gravel roads, snowmobile trails or old logging roads. Of the total

8.8 mile length of these proposed trails, only nine-tenths of a mile travel through natural forest area, creating a net new impact of 3.1 acres.

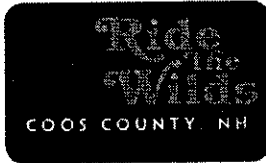
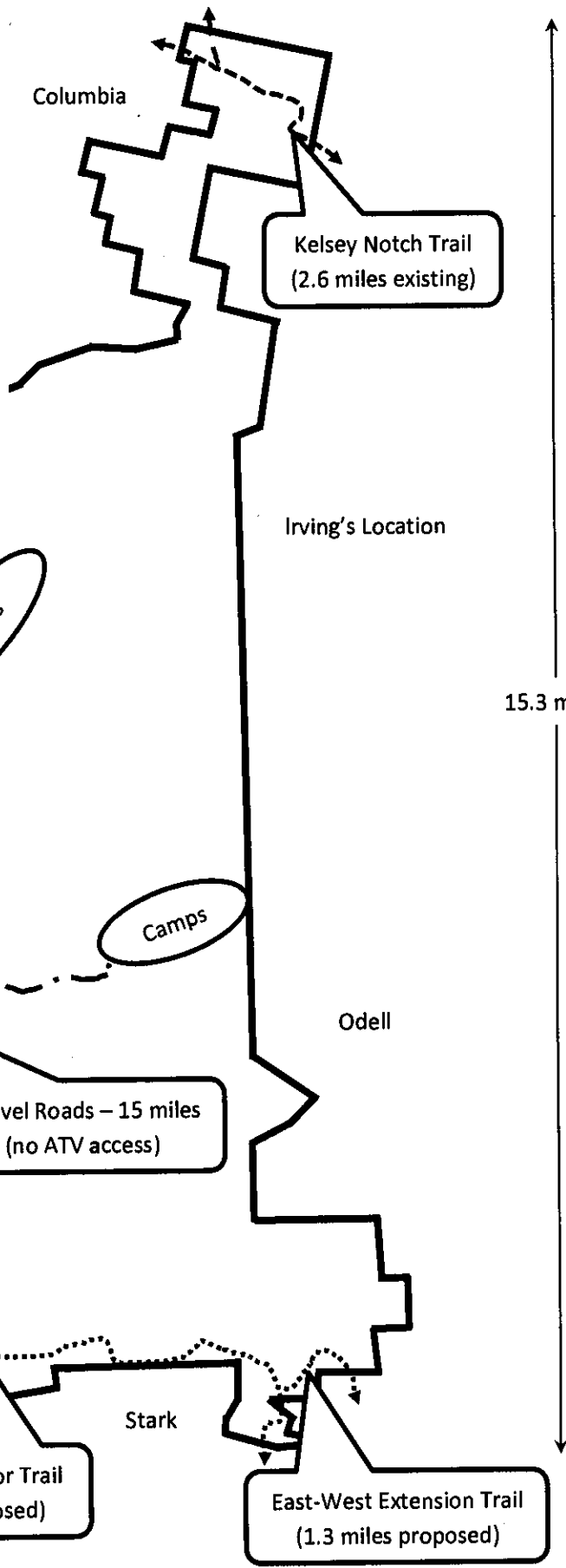
The citizens of New Hampshire own Nash Stream Forest and they pursue many different forms of recreation including hiking, fishing, hunting, camping, boating, dog sledding, cross country skiing and snowmobiling. In addition, there are over 19,000 New Hampshire residents that also enjoy OHRV riding.

Private landowners on three sides of the Forest have stepped up to allow trails on their land creating essential connector trails between several towns that are critical for our local small businesses to survive. The state must also do their part by allowing these OHRV trails to cross over this public land.

8.2 miles

Nash Stream Forest – Public Use Footprint		
Use	Miles	% of Forest
All gravel roads	66.5	.71%
Snowmobile trails	47.0	.36%
Hiking trails	21.3	.03%
West side ATV trail	8.0	.07%
Kelsey Notch ATV trail	2.6	.02%
So. ATV trail (Proposed)	1.3	.01%
East/West Trail (Proposed)	6.3	.06%
East/West Extension (Prop.)	1.3	.01%
91 Camps (private& state)		.06%
Total acres public use	528ac	1.3%
Total acres remaining	39,485ac	98.7%

Email questions to: feedback@nashstreamforest.com



Stratford

Columbia

Kelsey Notch Trail
(2.6 miles existing)

Irving's Location

15.3 miles

Camps

Camps

West Side Trail
(8.0 miles existing)

Gravel Roads – 15 miles
(no ATV access)

Odell

Groveton

Southern Connector Trail
(1.3 miles proposed)

East-West Corridor Trail
(6.3 miles proposed)

Stark

East-West Extension Trail
(1.3 miles proposed)

Guinn, William

From: Terry Jamro <tjamro@gmail.com>
Sent: Tuesday, February 28, 2017 6:16 AM
To: DRED: Nash Stream Plan
Subject: Support for Nash Stream Forest Plan that includes ATV trails

I support the Nash Stream Forest Plan that includes the West Side ATV Trail, the Kelsey Notch ATV Trail, the Southern Connector ATV Trail, the East West Corridor Trail, and the East West Corridor Extension ATV Trail. The Nash Stream Forest land was purchased with unrestricted public funds with no laws or covenants that prohibit ATV trails. Continued public access for all types of recreation is extremely important to the state of New Hampshire. The footprint of ATV trails is minimal; especially considering there are existing gravel roads throughout the Nash Stream Forest that allows logging trucks, cars, 4WD vehicles, motorcycles, and trail bikes.

Terry Jamro
7 Clark Road
East Kingston, NH 03827
tjamro@gmail.com

Guinn, William

From: lucy wyman <craigloo@yahoo.com>
Sent: Tuesday, February 28, 2017 8:05 AM
To: DRED: Nash Stream Plan
Subject: Comment: Revised Draft for Nash Stream Forest

Commissioner Jeff Rose, et al:

I well recall the mad scramble to save Nash Stream Valley from development and gravel extraction in '95. It was a sweet success and the carefully crafted management planned that followed enhanced this accomplishment with well-thought out management, building on the existing ecological properties and limited, recreational use that was already in place. It seemed like we got it right this time!

Sadly, and so typically, as time passes-and entropy and human nature drive the destruction of our climate and resource base-this fine plan seems to be undermined instead of re-inforced. It is counterintuitive and irresponsible to reduce the capacity of this tract to sequester more carbon rather than less.

In spite of the prohibition against ATVs in the original plan, inroads have already been made by the aggressive and well-organized ATV community into this State Forest. Now come requests for additional access. History shows it will not stop there, regardless of promises made. Nor do I agree with the oft-repeated justification to keep these vehicles off town roads: I would much prefer to have these motorized vehicles on the existing roads rather than adding more roads to the forests and woodlands! This is where people go to find peace and quiet, clean air and untrammled pathways. As far as providing access for the disabled and elderly, in Nash Stream Valley there is already a good gravel road for automobile use on the east side!

How is it justifiable to have motorized traffic (according to reports on RGGI now the greatest contributor to carbon in the Northeast) straddling Nash Stream, particularly in light of original plan's mandate "to use and build upon, rather than work in opposition, ecological principles and natural tendencies."? Clearly this new plan, with more cutting, younger forests, reduced set-backs along waterways and increased use by internal combustion engines is counter to the admirable and singular plan laid out but the first committee tasked with caring for this north country "jewel". Please consider a revision of this revision!

Thank you for the opportunity to comment-

Lucy K. Wyman, Lancaster

Guinn, William

From: Laura Sabre <xsabres@rocketmail.com>
Sent: Tuesday, February 28, 2017 8:01 PM
To: DRED: Nash Stream Plan
Subject: Plan Revision

Brad- As a former member of the advisory committee, I am supportive of most of the revisions to the Mgt. plan. However, i have great concerns regarding further intrusions into the Nash Stream Forest by ATV use. I believe it would be in direct conflict with the original intent of "traditional" use outlined in the plans inception. ATV users currently have Jericho Park and thousands of miles of trails in Ride the Wild network. There needs to be places in the North Country where people can still go beyond the sounds of man, without the din of vehicle noise in the background.

Sincerely, Steve Sabre

Guinn, William

From: luckylu18@comcast.net
Sent: Tuesday, February 28, 2017 9:22 PM
To: DRED: Nash Stream Plan
Subject: ATV Use in the Nash Stream Forest
Attachments: ATV Use Nash Stream-030117.docx

Dear Director Simpkins,

Please accept the attached in opposition to the proposed expanded use by ATVs of the Nash Stream Forest. Thank you for your attention.

Respectfully, **Gayle Bassick, Esq.**

March 1, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development

Dear Director Simpkins:

My name is Gayle Bassick and I am an annual visitor to the Nash Stream Forest area. I would respectfully request that additional ATV/OHRV use not be permitted in the Nash Stream Forest.

I have been visiting the Nash Stream Forest area since 1963. With each visit, I am renewed by the beauty, serenity and quiet solitude of the area. I cherish the natural environment, the untarnished splendor and the excitement of chance encounters with the wildlife. And also with each visit, I am assured that true nature, in its purest form, continues to thrive in this sanctuary.

I have always admired and appreciated the vision of the protectors of this area. It has certainly taken great foresight to preserve this land in its natural state, resisting the temptation to allow unbridled encroachment of modern uses, such as ATVs. It seems somewhat shortsighted to now consider such use, beyond what is currently permitted. It is also sad to think that children in the area wouldn't experience the hush of these woods, or the sweet birdsong, or the thrill of freezing in place expectantly to see what animal may have just snapped the twigs on the forest floor. Surely these wonders are worthy of preservation for generations to come.

I respectfully implore those who are considering the expanded ATV/OHRV use of the Nash Stream Forest to be steadfast in their stewardship of what is perhaps one of the most perfectly unadulterated places. Thank you for your time and consideration.

Respectfully,

Gayle T. Bassick, Esq.

Guinn, William

From: Barbara Lamphere <barbara_birch_lamphere@jsi.com>
Sent: Tuesday, February 28, 2017 9:56 PM
To: DRED: Nash Stream Plan
Cc: Jay Espy; wabbott@forestsociety.org
Subject: Letter Opposing Creation of New ATV Trails, Nash Stream Forest
Attachments: No ATV Letter.pdf

Dear Director Simpkins,

Please find attached my letter in opposition to creation of new ATV trails in the Nash Stream State Forest. I request that you take my request into consideration among others voicing their opinions on this topic. The beauty, tranquility and environmental integrity of New Hampshire's forests are sacred and should be preserved.

Respectfully yours,
Barbara Lamphere

February 28, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

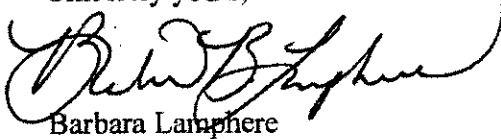
Dear Director Simpkins:

My family has been enjoying the natural beauty of Christine Lake since 1884 when my great, great grandfather first fished its waters. We have had a home there since that time and have taken great efforts as members of the Percy Summer Club to protect the surrounding lands and watershed. The proposed measures to create new ATV trails in the Nash Stream State Forest are in conflict with the good faith intent of the Club in granting a conservation easement on its land surrounding Christine Lake to augment protection of the watershed agreements, and threaten the quiet enjoyment of traditional recreational users, especially hikers like myself and my family who treasure our time in the woods.

Creation of these ATV trails is inconsistent and incompatible with the original 1995 management plan and the primary reasons for creation of the State Forest 1) to ensure that the property continues to contribute to forest economy through the sale of wood products, 2) to provide continued public access for traditional recreation uses, and 3) to protect the Nash Stream watershed's natural beauty and ecological values. Heavy ATV use in the Nash Stream Forest will cause significant environmental damage to streams, sensitive natural areas and wildlife communities that will impact the ability of future generations to enjoy and appreciate New Hampshire's greatest asset, its beautiful forests, unique ecosystems, and magnificent wildlife.

I am appealing to you and the state to honor the vision in the original master plan and not allow additional ATV trails in Nash Stream Forest.

Sincerely yours,



Barbara Lamphere

Prospect Lodge
321 Summer Club Rd.
Stark, NH 03582

321 Ericsson Ave.
Berterton, MD 21610
301-467-9495

Guinn, William

From: Lisa Craig <Lisa.Craig@holton-arms.edu>
Sent: Tuesday, February 28, 2017 10:07 PM
To: DRED: Nash Stream Plan
Subject: ATV trail expansion in the Nash Stream Forest

Sent from my T-Mobile 4G LTE Device

----- Original message -----

From: Lisa Craig <Lisa.Craig@holton-arms.edu>
Date: 2/27/17 12:50 PM (GMT-05:00)
To: nashstreamplan@dred.nh.com
Cc: jay.espy@gmail.com
Subject: ATV trail expansion in the Nash Stream Forest

February 27, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development

Dear Sir,

My name is Elizabeth Craig and I have a cottage along the shore of Lake Christine. Today I am writing to express my concern about the proposed increased OHRV/ATV use in the Nash Stream Forest for a number of reasons.

Many years ago the Percy Summer Club entered into extensive negotiations about placing much of the land around Christine Lake in a conservation easement. Through the donations of private land, club land, and state land into this easement, the view shed of Christine Lake would be protected for all to enjoy now and for generations to come. The lake and the surrounding lands were to be maintained in a natural state, as much as possible, so everyone could experience the beauty that is the Nash Stream Forest. Lake Christine is a unique spot, mostly untarnished by modern development, a place for renewal and a return to the pristine beauty of nature. The lakes and ponds of this area along with the numerous hiking trails allow people to remember why they love and value the Great North Woods. It speaks to the importance of this vision that the State of New Hampshire, the US Forest Service, the Society for the Protection of New Hampshire Forests and the Percy Summer Club all worked together to preserve this area.

I cannot believe that allowing increased OHRV/ATV use within the Nash Stream Forest is part of this intended vision. I understand that the management plan calls for "traditional low-impact uses" such as hiking, kayaking, or snow shoeing. I realize that "ATVing" is a popular activity and brings needed income to the area, but it is certainly not a "low-impact use." It carries along with it many undesirable attributes to those seeking a retreat – noise, habitat destruction, and potential casualties to human life. Motorized "recreation" in wild areas seems to be somewhat incongruous.

In terms of impact on the environment, motorized “recreation” is anything but low-impact. The great North Woods prides itself on being “less populated, with many opportunities to see wildlife including moose, black bear and deer; this section of New Hampshire is a must-see for nature lovers.” (<http://www.visitnh.gov/what-to-do/scenic-drives/great-north-woods.aspx>) This will not be as advertised with ATVs coursing through the Nash Stream Forest. This area boasts streams, riparian woodlands, wetlands, and beautiful deciduous forests, many of which are sensitive to today’s environmental pressures. Climate change and acid rain are already causing stress to this area; there is no need for additional stressors or habitat destruction. Let the wild areas be without the added threats of more motorized recreational vehicles or ATV trail expansion. I thank you for your consideration.

Sincerely,
Elizabeth L. Craig

Guinn, William

From: Jay Espy <jay.espy@gmail.com>
Sent: Wednesday, March 01, 2017 8:29 AM
To: DRED: Nash Stream Plan
Subject: Comments of Jay Espy, Nash Stream Forest
Attachments: Espy Comments on Nash Str Final.docx

Dear Director Simpkins,

I am attaching my comments delivered at the Whitefield public meeting on February 16, 2017.

With thanks,

Jay Espy

To: Director Brad Simpkins
NH Department of Resources and Economic Development

Draft Nash Stream Forest Management Plan
Public Comment Session on February 16, 2017, Whitefield, NH

Comments of Jay Espy, Percy Summer Club of NH, Stark NH

My name is Jay Espy and I am a camp owner on Christine Lake in Stark and a member of the Percy Summer Club of New Hampshire, an organization that has been in existence since 1882. I speak tonight to ask that additional ATV/OHRV use not be permitted in the Nash Stream Forest. I do not speak in general opposition to ATVs and would be glad to work with ATV organizations on future trail planning. But, having been involved in the planning effort in the late 1980's to conserve lands around Christine Lake for the purpose of complementing the State's purchase of Nash Stream, I believe that use of ATV's in the Forest is in direct conflict with the original purposes and agreements made at the time of the State's acquisition.

In 1987, when the Land Conservation Investment Program (LCIP) was created by the state, John Kauffmann, then a member of PSC, proposed the idea of granting a conservation easement on PSC land to protect the remote, mostly-undeveloped and quiet nature of the lake. He, along with leadership at DRED and the Society for the Protection of New Hampshire Forests recognized that Christine Lake was a unique resource – a deep, cold, clear lake with a forested watershed that remains virtually fully intact. Outside of the White Mountain National Forest, this is likely the largest remaining watershed of its type in the State.

Mr. Kauffmann and his family had, over many decades, acquired lands adjacent to PSC's holdings and the Nash Stream Forest tract. With guidance from SPNHF, Kauffmann and the Club began drafting conservation easements to protect the land surrounding Christine Lake. They would donate these easements if the State and US Forest Service were successful in securing similar protective measures on the 40,000 Nash Stream property, thereby conserving the entire watershed for habitat, recreation and forestry.

Late in 1988, the US Forest Service was persuaded to purchase a conservation easement on the Nash Stream tract from the owner, Rancourt Associates, thereby making it financially feasible for the State to purchase the underlying fee title to the land. This was the first federal easement of its kind anywhere in the nation. This easement required the State to develop a long-term management plan for the Forest. Mr. Kauffmann and PSC began discussions with DRED and SPNHF to develop a sustainable management plan for the property. Mr. Kauffmann and PSC agreed to grant a conservation easement conserving their holdings with the understanding that the State would develop a management plan compatible with protection of public values enjoyed from the lake. DRED leadership

agreed with this vision and created a plan that sought to protect soils, water quality, views, forest diversity and quiet enjoyment of the lake and surrounding forest. Forest harvesting would be conducted in a manner that would protect these values rather than maximize production or disturb the natural surroundings.

The original 1995 plan prohibited ATV/OHRV use on the property. Although a pilot trail on the West Side Road was allowed in 2002 and a second pilot trail to the north at Kelsey Notch was permitted more recently, adding additional trails for this purpose would certainly not be compatible with the management plan agreed to by the parties. The impact of ATVs on soils, water quality and, most importantly, the quiet use of the lake and surrounding lands, including numerous hiking trails, are clearly outside of the parameters agreed to at the time or compatible with existing and historic uses.

In 1990, John Kauffmann voluntarily agreed to forgo substantial future monetary value from his land by granting conservation easements on 290 acres. PSC followed suit in 1991, granting a conservation easement on its 374 acres surrounding all but a 200-foot strip at the end of the lake that was already in State ownership. With these donations, the entire lakeshore was conserved for the enjoyment of the public. These voluntary acts were made in good faith with the belief that the State would uphold its end of the bargain in ensuring that Nash Stream Forest would be managed as a working forest employing exemplary forest harvesting practices and as a remote, wild recreational resource.

Mr. Kauffmann and SPNHF continued their efforts to protect this remarkable watershed and its surrounding woods and trails by acquiring and donating additional lands through SPNHF. Today, more than 2,000 acres of forestland, managed for its recreational, ecological and productive values constitute SPNHF's Kauffmann Forest.

The vision of those who created the Nash Stream Forest and protected adjacent lands around Christine Lake and on nearby hills and mountains is paying increasing dividends today. During the past two decades, the Coos Trail has been developed, bringing increasing numbers of day hikers and through hikers to the area. Kayaking and canoeing visits to Christine Lake have increased dramatically in recent years. These numbers are growing with more local outfitters recommending Christine Lake as a paddling destination. Efforts made by PSC to keep the beach on the east end of the lake clean and safe have resulted in an increasing number of families visiting the beach for swimming and quiet recreation. The parking lot at the beach, which PSC built and maintains, is also seeing increasing use by hikers accessing the woods road that leads to the Coos Trail and adjacent side trails. There are many days now that the parking lot is completely full.

Mention was made at the public Citizen's Committee meeting on December 14 that the Coos Trail could be moved to accommodate both hikers and ATV riders. I disagree with this assessment. The Coos Trail traverses the course it does because

of the unique resources available in the southern portion of the Nash Stream Forest. From the Percy Road, the Trail crosses between Long and Bald Mountains and in front of Victor Head where an historic and well-maintained side-trail leads to the summit. From the summit of Victor Head, spectacular views to the Mahoosuc Mountains in Maine, the peaks of the Pilot Range and the Connecticut River valley are visible. From Victor Head, the Coos Trail traverses the course of the old Summer Club Trail, a trail that has been in use since at least the early 1900s. This trail is now enjoyed by thousands of hikers each year. Impacts associated with use of ATVs in this section of the Nash Stream Forest would not be limited to incompatible trail beds. The noise from ATVs, motocross bikes and other motorize wheeled vehicles would fundamentally alter the wild and remote nature of the experience for all other recreational users. Additionally, use of such vehicles would create problems associated with soil erosion as well as incursions on sensitive natural areas and wildlife. These impacts are simply incompatible with the original vision and agreements struck by those who worked hard and made significant personal and financial sacrifice to ensure that Nash Stream Forest would stand as an exemplary forest resource for New Hampshire.

I want to be clear that my goal is not to deny responsible ATV riding in the region. I would welcome the opportunity to work with ATV organizations to find alternative options for meeting their goals. However, as a member of the advisory committee that was a precursor to the Nash Stream Forest Citizen Committee (in the early 2000's), a camp owner and someone who hikes and maintains the trails in this region and helps keep the Christine Lake beach and surrounding lands clean for all visitors, I ask that you and your colleagues please not permit an incompatible use that will deny the intent of good faith agreements made, and forever change the nature of this unique place.

Thank you.

Guinn, William

From: Cam Bradshaw <cambradshaw58@gmail.com>
Sent: Wednesday, March 01, 2017 8:35 AM
To: DRED: Nash Stream Plan
Subject: ATVs in Nash Stream

I applaud your decision not to allow the east/west trail but I believe there should be no expansion of ATV use in Nash Stream. The majority of your Technical Team had concerns that a South Connector could lead to riders illegally accessing the Nash Stream Road. My experience in Berlin is that a significant number of riders do not stay on designated trails. Enforcement is a problem.

If you do revisit the South Connector Trail in the future will there be a chance for the public to weigh in? Will we be able to weigh in on the Kelsey Notch Trail at the end of its probationary period?

ATV riders need to show that they are capable of maintaining and policing the trails they have before they are allowed to expand their network. They need to prove they can coexist with traditional users and that they bring more good than harm to the communities they inhabit.

Thank you for the opportunity to comment on the plan.

Cam Bradshaw
Berlin, NH

Guinn, William

From: George Hamilton <ghamilton@iscvt.org>
Sent: Wednesday, March 01, 2017 9:25 AM
To: DRED: Nash Stream Plan
Cc: Madelyn Hamilton
Subject: Letter to Director Simpkins
Attachments: Simpkins, Nash Stream Management Plan.docx

Dear Director Brad Simpkins,

Please see the attached letter commenting on the draft Nash Stream Forest Management Plan.

I would be happy to answer any questions.

George Hamilton

Stark, NH

**George and Madelyn Hamilton
Stark, NH 03582**

February 26, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

My wife and I have been hiking within the Nash Stream forest for more than 40 years. It is one of the most beautiful and peaceful sections of New Hampshire. An area of New England that is relatively unspoiled as a place for hiking, fishing and hunting. Over the years, we have noticed a significant increase in usage (thanks to the Cohos trail) particularly among young people who seek a quiet escape from an increasingly noisy and motorized world. It is wonderful to see so many people enjoying the landscape while respecting the enjoyment of others.

It was the original intent of the Nash Stream forest management plan to prohibit ATV use. We strongly support this position. Over the years, the plan has been amended to allow "minimal uses" for ATVs. This incremental retreat from the core principles of the original plan is disheartening and should not be continued. Once you sacrifice the integrity of place, it cannot be reclaimed.

In Section 10.3.4 of the Draft Nash Stream Forest Management Plan, we particularly oppose objective 2. There should be no expansion of the ATV trail system through a connector trail.

Thank you for your kind attention. I would be happy to answer any questions.

With best wishes,

George

Guinn, William

From: Field Rider <frider@megalink.net>
Sent: Wednesday, March 01, 2017 9:23 AM
To: DRED: Nash Stream Plan
Cc: Field Rider
Subject: Nash Stream Plan

3-1-17

Director Brad Simpkins
NH Department of Resources and Economic Development

I write to express my concern about and opposition to opening the Nash Stream Forest to All Terrain Vehicle use. ATV use is incompatible with current uses of the property and its surrounds.

I own a camp on Christine Lake in Stark and I spend much time hiking in and enjoying the Nash Stream Forest land as do countless others. I spend much time on Christine Lake with an increasing number of the public who enjoy its character.

The value of Nash Stream Forest is largely defined by its distance from the sight and sound of mechanization and motorsports.

Adjacent Christine Lake is horsepower-limited to provide the same quiet enjoyment of peace uninterrupted by the sound of such motorsports.

The proposed trail will create a distraction and interruption to the quietude specifically sought for years by those who recreate in the area.

Christine Lake will be particularly impacted by the proposed site of the ATV trail. The proposed trail will run on a slope NE of, and at an elevation higher than that of Christine Lake. The elevation behind the proposed trail is higher than the trail is so that noise is amplified by the amphitheater effect on the lake and surrounding conserved land. During the evening, even the soft sound of Rowell Brook's descent into Christine Lake can be heard on the lake as a result of this amphitheater effect. Motor vehicle noise in this area will not be ignorable.

Motor vehicle noise will adversely change the character and experience of the many members of the public who visit both the Forest and Christine Lake.

The Percy Summer Club created and has for years maintained the parking area and Beach on Christine Lake for the enjoyment and use by the public. This area has become increasingly used by the hiking and walking public as a trailhead to enter the Nash Stream Forest and its trail system. The public has increasingly been using the Lake with canoes and kayaks BECAUSE of its quiet and lack of the sound of machinery ever-present at surrounding publicly accessible lakes and ponds.

The Percy Summer Club granted a conservation easement on its shoreline property surrounding Christine Lake to protect the quiet described above and to complement the efforts of the State of New Hampshire in acquiring Nash Stream Forest.

An ATV trail is inconsistent with and threatens existing conditions, and conflicts with the good faith cooperation, intent, expense and management efforts countless numbers of people and organizations have made, and continue to make on behalf of the public.

I urge you not to accommodate the ATV users' request to allow a trail in this area. It would create an unacceptable disturbance to a place kept so special.

I urge you to deny the request to provide ATV access in the Nash Stream Forest.

Sincerely,

Field Rider

Field Rider
275 Summer Club Road
Stark NH
03582

And
80 Gloucester Hill Road
New Gloucester, ME
04260

Guinn, William

From: Stephanie Kelliher <stephkelliher@yahoo.com>
Sent: Wednesday, March 01, 2017 10:22 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Management Plan Comments

To whom it may concern,

We are writing to express our concern about allowing more ATV access in the Nash Stream Forest. If ATV use was allowed on the Kelsey Notch Trail without first determining if it was legal what is to prevent them from using more trails without first determining it's legality? I believe allowing ATV takes away form the experience of other people using this land for other recreational reasons. ATVs are loud and smelly and in my experience people on ATV's have less regard for the land they are riding on. I believe there was a reason the original Nash Stream plan allowed for no motorized vehicles, and although it now allows for "minimal" lets keep it that way with just the one trail. Just because there is a current fad in ATV does not mean it is what people who live here want. We are young people who moved to the North Country because of the natural beauty and for peace and quiet. The reason ATV use has become so popular here is because no one else wants it in their backyard. This is our backyard and we don't want it here. If ATV users are given more they will continue to ask for more.

Our understanding is that the proposed East/West corridor would follow the Cohos Trail. That seems absurd to us. People hiking that trail do not want to be passed and followed by ATV users. We also read in the ATV briefing that "Fish and Game was also concerned about the third section of trail which would require new construction through an undisturbed, un-fragmented spruce-fir forest which provides ideal habitat for martin, bobcat and lynx." Species like lynx are finally starting to make a come back and we want to disturb one of the few undisturbed un-fragmented habits left.

It is for these reasons that we would ask you go with option 2 from the ATV Briefing
Option 2: Keep OHRV use consistent with 2002 Plan amendment

- No OHRV expansion beyond the West Side Trail.
- Eliminate the Kelsey Notch (pilot) Trail.

Thank you,

Stephanie Kelliher and Beau Etter

Whitefield residents

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:01 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream

----- Forwarded Message -----

Subject: Nash Stream
Date: Wed, 1 Mar 2017 01:29:38 +0000
From: Roger Pelletier <rpell1997@hotmail.com>
To: feedback@nashstreamforest.com <feedback@nashstreamforest.com>

Hi,

I would like to put my part in Nash stream. I am a hiker, fisherman, Hunter ,Snowmobiler, And a family ATV rider. I did go to meeting in White Mountain High School, I think that a lot people are missing the point, everybody should enjoy the land that belong to all the people, the land should be use to everybody , the ATV club are trying to make a very imported connection which it will not interfere with a hiker,fisherman,Hunter,and it will help Snowmobiler for trail repair, the ATV club is only trying get 1.3 mi by maybe 8 ft southern connector and 6.3 miles by 10 ft for east west corridor which is real .ot a lot of area of Nash Stream. We need to work together to help each other out, it will help economy in area which the Coos County need. I believe that your committee will approve recommended for ATV.

Thank you for time
Roger Pelletier P.S. Everybody did a great job at the meeting,

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:02 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Project

----- Forwarded Message -----

Subject: Nash Stream Project
Date: Tue, 28 Feb 2017 20:16:37 -0500
From: drew.lasick <drew.lasick@charter.net>
To: feedback@nashstreamforest.com

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. My family and I live in MA and have a camp in NH whereby we have direct access to the trails. During the camping season we try to go up every weekend. We love it up there and enjoy the outdoors. Living in MA limits our ability to ride.

In addition to the existing trails, we would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. We would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Thank you

Drew Lasick
87 lakeside ave
Webster, MA 01570
802-578-4075
Sent from my Verizon, Samsung Galaxy smartphone

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:04 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Letter

----- Forwarded Message -----

Date: Tue, 28 Feb 2017 18:17:47 -0500
From: Moe Lussier <mrgarrett@comcast.net>
To: feedback@nashstreamforest.com

Attention Brad Simkins: please support establishing this trail and see repeated recommendations below:

1. Include the 8.0-mile **West Side ATV Trail** as a permanent trail.
2. Include the 2.6-mile **Kelsey Notch ATV Trail** as a permanent trail.
3. Allow the construction of a new 1.3-mile **Southern Connector ATV Trail** between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas.
4. Allow the construction of a new 6.3-mile **East West Corridor ATV Trail** that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark village.
5. Include an option for allowing future construction of a 1.3-mile **East West Corridor Extension ATV Trail** that will exit onto Bell Hill Road
6. The Nash Stream Forest land was purchased with unrestricted public funds from the State of NH and the Federal Government.
7. There are no laws or covenants that prohibit ATV or UTV trails in Nash Stream Forest.
8. There are over 19,000 NH residents that registered OHRV's in NH in 2016. Those residents have just as much right to recreate in Nash Stream Forest as hikers, fishermen, hunters, snowmobilers and camp owners.

Info: When the Nash Stream land was bought, these were the goals:

- a. "Ensure that the property continues to contribute to forest economy through the sale of wood products; "
- b. "Provide continued public access for recreation; and "
- c. "Protect the area's natural beauty and ecological values."

What you can say about these original goals:

9. The current and proposed ATV/UTV trails will not have any impact on the logging operations in Nash Stream Forest.

10. There are 15 miles of gravel roads for public access (camp owners, fishermen, hunters, sightseers, etc.), 47 miles of trails for snowmobile access, 21 miles of trails for hiker access. There are 10.6 miles of current ATV trails and 8.9 miles of newly requested ATV/UTV trails, which is in line with the amount of trails and roads allowed in the plan for other user groups.

11. All of the current and proposed ATV/UTV trails are located along the outer perimeter of the forest, creating no negative impacts on the traditional uses in the heart of the forest. Even though logging trucks, cars, pickups, 4WD vehicles, motorcycles and registered trail bikes can access the heart of the forest by traveling along its gravel roads, there will be no ATV or UTV trails on these roads.

12. Adding up the footprint of all the camps, gravel roads, snowmobile trails, hiking trails and ATV/UTV trails (both current and proposed) equals 528 acres or 1.3% of the forest. In other words, 98.7% of the forest would be left in its natural state, which certainly meets goal "c" listed above. Only 70.7 acres or .18 percent of the forest (less than ¼ of one percent) would be used by all of the current and proposed ATV trails

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:06 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Plan

----- Forwarded Message -----

Subject: Nash Stream Plan
Date: Tue, 28 Feb 2017 14:38:12 -0500
From: Shannon Stacey <shannonstacey@gmail.com>
To: feedback@nashstreamforest.com

28 February, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

We are writing to express our support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), we would also like to see a new Southern Connector trail developed so ATVs can get to the gas station located just south of Nash Stream Forest. We would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. Our understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

We hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely,

Stuart and Shannon Stacey

32 Prospect St

Tilton, NH 03276

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:07 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Fwd: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan
Attachments: Sullivan County ATV- Nash Stream Letter.docx

----- Forwarded Message -----

Subject: Fwd: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan
Date: Tue, 28 Feb 2017 08:58:58 -0500
From: Teresa Lambert <lambertterry290@gmail.com>
To: feedback@nashstreamforest.com, Brad.Simpkins@dred.nh.gov

----- Forwarded message -----

From: Teresa Lambert <lambertterry290@gmail.com>
Date: Tue, Feb 28, 2017 at 8:55 AM
Subject: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan
To: feedback@nashstreamforest.com, tpenni290@gmail.com, teresa.l.lambert@hitchcock.org



Claremont, NH

To:
Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Please be aware of the desire of our club and its members to support the Nash Stream Forest Plan as follows. We are a family orientated club and our motto is "**Responsible Riding in Harmony with Landowners**".

- Include the 8.0 – mile **West Side ATV Trail** as a permanent trail
- Include the 2.6-mile **Kelsey Notch ATV Trail** as a permanent trail.
- Allow the construction of a new 1.3-mile **Southern Connector ATV Trail** between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas.

- Allow the construction of a new 6.3 – mile **East West Corridor ATV Trail** that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark Village.
- Include an option for allowing future construction of a 1.3 – mile **East West Corridor Extension ATV Trail** that will exit onto Bell Hill Road.

-
- The Nash Stream Forest land was purchased with **UNRESTRICTED PUBLIC FUNDS** from the State of NH and the Federal Government.
 - There are no laws or covenants that prohibit ATV or UTV trails in Nash Stream Forest.
 - There are over 19,000 NH residents that registered OHRV's in NH in 2016. Those residents have just as much right to recreate in Nash Stream Forest as hikers, fishermen, hunters, camp owners and snowmobilers.

Goals of the purchase of the Nash Stream land:

"Ensure that the property continues to contribute for forest economy through the sale of wood products"

"Provide continued public access for recreation and Protect the area's natural beauty and ecological values"

The current and proposed ATV/UTV trails will not have any impact on the logging operations in Nash Stream Forest.

There are 15 miles of gravel road for public access (camp owners, fishermen, hunters, sightseers, etc.), 47 miles of trails for snowmobile access, 21 miles of trails for hiker access. There are 10.6 miles of current ATV trails and 8.9 miles of newly requested ATV/UTV trails, which is in line with the amount of trails and roads allowed in the plan for other user groups.

All of the current and proposed ATV/UTV trails are located along the outer perimeter of the forest, creating no negative impacts on the traditional uses in the heart of the forest. Even though logging trucks, cars, pickups, 4WD vehicles, motorcycles and registered trail bikes can access the heart of the forest by traveling along its gravel roads, there will be no ATV or UTV trails on these roads.

Adding up the footprint of all the camps, gravel roads, snowmobile trails, hiking trails and ATV/UTV trails (both current and proposed) equals 528 acres or 1.3% of the forest. In other words, 98.7% of the forest would be left in its natural state, which certainly meets one of the goals of "Protecting the area's natural beauty and ecological values". Only 70.7 acres or .18 percent of the forest (less than 1.4 of one percent) would be used by all of the current and proposed ATV trails.

www.SullivanCountyATV.org

P.O. Box 64

Claremont, NH 03743

President: Mark Carrier

Vice President: Walt Elhardt

Treasurer: Dianne Harlow

Secretary: Terry Lambert secretary@sullivancountyatv.org

Trail Administrator: Ken Harlow

Board of Directors: Fred McCoy, Holly Carrier, Tink Johnson



Claremont, New Hampshire

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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Secretary: Terry Lambert secretary@sullivancountyatv.org

Trail Administrator: Ken Harlow

Board of Directors: Fred McCoy, Holly Carrier, Tink Johnson

Guinn, William

From: Simpkins, Brad
Sent: Tuesday, March 07, 2017 12:30 PM
To: DRED: Nash Stream Plan
Subject: FW: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan
Attachments: Sullivan County ATV- Nash Stream Letter.docx

From: Teresa Lambert [<mailto:lambertterry290@gmail.com>]
Sent: Tuesday, February 28, 2017 8:59 AM
To: feedback@nashstreamforest.com; Simpkins, Brad <Brad.Simpkins@dred.nh.gov>
Subject: Fwd: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan

----- Forwarded message -----

From: Teresa Lambert <lambertterry290@gmail.com>
Date: Tue, Feb 28, 2017 at 8:55 AM
Subject: Sullivan County ATV Club - Support of proposed Nash Stream Forest Plan
To: feedback@nashstremforest.com, tpenni290@gmail.com, teresa.l.lambert@hitchcock.org



Claremont, NH

To:
Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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P.O. Box 64

Claremont, NH 03743

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Vice President: Walt Elhardt

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Secretary: Terry Lambert secretary@sullivancountyatv.org

Trail Administrator: Ken Harlow

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Claremont, New Hampshire

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NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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President: Mark Carrier

Vice President: Walt Elhardt

Treasurer: Dianne Harlow

Secretary: Terry Lambert secretary@sullivancountyatv.org

Trail Administrator: Ken Harlow

Board of Directors: Fred McCoy, Holly Carrier, Tink Johnson

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:08 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Support for Nash Stream Forest Plan that includes trails for ATVs

----- Forwarded Message -----

Subject: Support for Nash Stream Forest Plan that includes trails for ATVs
Date: Tue, 28 Feb 2017 06:00:04 -0500
From: Terry Jamro <tjamro@gmail.com>
To: feedback@nashstreamforest.com

I support the Nash Stream Forest Plan that includes the West Side ATV Trail, the Kelsey Notch ATV Trail, the Southern Connector ATV Trail, the East West Corridor Trail, and the East West Corridor Extension ATV Trail. The Nash Stream Forest land was purchased with unrestricted public funds with no laws or covenants that prohibit ATV trails. Continued public access for all types of recreation is extremely important to the state of New Hampshire. The footprint of ATV trails is minimal; especially considering there are existing gravel roads thru out the Nash Stream Forest that allows logging trucks, cars, 4WD vehicles, motorcycles, and trail bikes.

Terry Jamro
7 Clark Road
East Kingston, NH 03827
tjamro@gmail.com

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Wednesday, March 01, 2017 4:11 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash Stream Plan

----- Forwarded Message -----

Subject: Nash Stream Plan
Date: Mon, 27 Feb 2017 23:00:31 -0500
From: Diane Ufnal <ufnald@gmail.com>
To: Brad.Simpkins@dred.nh.gov
CC: feedback@nashstreamforest.com

Feb 27, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

As a personal supporter of NH conservation efforts (specifically, the Monadnock Conservancy, Moose plates, Wildlife Journal magazine, etc) I take great interest and pride in helping to make sure that monies and lands are set aside to maintain some wild and beautiful areas in their natural state for future generations. It is important to me to share a sense of wonder and appreciation for nature with other people as well. I walk and hike outdoors as often as I can, and I encourage others to do the same. I try to always point out beautiful aspects that I notice along the way, so that others may see the grandeur of our fine state and land.

One of my other interests is ATV riding, on a recreational basis. This allows me (us) to get out and see vistas we wouldn't reach otherwise. We get to see MORE of NH. We seek out trails we have not yet explored, and go

there, and ride them to see what they're about. I am thrilled that NH seems to have a growing level of acceptance/appreciation for ATV recreators... as we are not only a valid source of local income for smaller businesses, but I like to think that the acceptance has at its base an understanding that ATV enthusiasts aren't just into motoring about... it is also about seeing MORE of NATURE, and getting outside, in a new way. It's more rapid-fire than walking... so you get to see so much more, during the same allotment of time.

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. I personally have already ridden the loop this section helped form (more than once) during 2016, and found it enjoyable, with some quite beautiful sections made accessible. We've brought various friends to share the experience... (and each time, we eat our breakfast at a diner near the trails, had planned stops and bought lunch along the way, and stopped for snacks and gas too). I must admit, the road portion was not our favorite section (we prefer woodsy trails) - even though we greatly appreciated their use so that we could ride the full loop, instead of having to backtrack to get back to our starting point.

The Nash Stream State Forest land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

I've seen so many families out and about in NH enjoying nature this new way, the "ATV way" , and I'll admit, my family is among them. I can't get my daughter and granddaughter to go hiking with me to save my life. But, they'd both jump to come out for an ATV ride. And stopping for a breather by a little brook, and pointing out the the trees and birds, and seeing the tracks and animal sign on the trail - and maybe glimpse a vista, or a deer along the way, or riding through spruces and smelling that sweet aroma - well, I'd appreciate sharing that with them during an ATV ride any day. And they just might appreciate the experience as well.

Please allow me to continue to appreciate the Nash Stream Forest, via the ATV experience, and to share it with others. Thank you for time and your consideration.

Sincerely Yours,

Diane Ufnal

13 Florence Ave.

Rindge, NH 03461

Guinn, William

From: Janis Finelli <finellijan@gmail.com>
Sent: Thursday, March 02, 2017 7:34 AM
To: DRED: Nash Stream Plan
Subject: Comment on ATVs in Nash Stream Forest
Attachments: 1702 DRED letter re Nash ATVs.pdf

Here's my comment letter. Thank you for the opportunity to comment.

**Janis C. Finelli
287 Summer Club Road
Stark, NH 03582**

February 26, 2017

Brad Simpkins, Director
New Hampshire Department of Resources and Economic Development
By email: nashstreamplan@dred.nh.com

Dear Director Simpkins:

Thank you for the opportunity to comment on the proposal to broaden ATV use in the Nash Stream Forest. My comments do not oppose ATV use generally, but I am opposed to opening up this protected area, which is currently managed according to a fair balance between ATVs and other uses with which further ATV use can drastically conflict.

I first visited Christine Lake in the early 1980s. As many do, I immediately loved the lake, the surrounding woods and streams, the magical mountain trails, and the peaceful atmosphere that had changed very little since the first camp was built on the lake in 1883. It is a great thing for future generations that this lake and its shoreline are perpetually conserved for their natural values and recreation uses, including significant public access to the lake, the beach and boat landing, and local trails. My husband and our young family visited the lake every year, even after my husband took work in New Mexico. In 2007 we were fortunate to purchase one of the camps on the lakeside. From that camp we have been able to experience this very special region more and more deeply. In winter, we help sponsor the use of snowmobiles in the area by providing access to trails. Winter uses also include fishing from the frozen lake surface, often with pickup trucks and snow machines on the ice. These uses are compatible with other recreation uses; just two weekends ago we cross-country skied and snowshoed along trails we share with snowmobile riders, whom we often stop and talk with about local issues or the weather. We welcome these uses and the contact with residents from all over the region.

It was our understanding when we purchased our camp that the Department of Resources and Economic Development had adopted a management plan for the Nash Stream watershed that sought to protect the natural beauty and ecological values of this unique area. We understood this to include forest management and continued public access for traditional recreation uses including fishing, hunting, hiking, snowmobiling, bird and wildlife watching and tracking, cross country skiing, and snowshoeing.

We are aware that ATV use has become increasingly popular over the years and is an enjoyable activity for many families. We support the operation and maintenance of a regional ATV system. We also believe that some of the impacts of ATVs are

inappropriate in some areas, affecting trail integrity for other users, and potentially damaging or disturbing native plant species, wildlife nesting, water quality, and aquatic species. Noise associated with ATV use goes far beyond the actual on-the-ground impact, affecting other recreation users even if they can no longer use or enjoy affected routes. We observed this directly in New Mexico and Colorado in areas where ATV use had been too broadly allowed.

Limiting ATV use to existing trails including the West Side Trail and the Kelsey Notch Trail is consistent with the state's acquisition of the Nash Stream Forest. It also makes good sense for the conservation of this unique area, for other traditional uses and users of the Forest, while allowing continued ATV use and enjoyment for ATV users. There is good balance in the current management approach, and we urge you to maintain that balance. In consideration of the many other users and uses that would be negatively affected, please do not open further areas of the Nash Stream Forest to ATV use. Thank you.

Sincerely,

Janis Finelli

Guinn, William

From: Jessie McGinley <jessiemcginley@gmail.com>
Sent: Thursday, March 02, 2017 8:08 AM
To: DRED: Nash Stream Plan
Subject: NASH STREAM ATV TRAIL STATEMENT

Dear Director Simpkins,

Please find attached my letter in *opposition to creation of new ATV trails in the Nash Stream State Forest*. I request that you take my request into consideration! *The environmental integrity of New Hampshire's forests are sacred and should be preserved.*

Regards



No ATV Letter.doc

Jessie K. McGinley
321 Summer Club Road
Stark, NH 03582

March 2, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

My family has been enjoying the natural beauty of Christine Lake since 1884 when my great, great grandfather first fished its waters. We have had a home there since that time and have taken great efforts as members of the Percy Summer Club to protect the surrounding lands and watershed. The proposed measures to create new ATV trails in the Nash Stream State Forest are in conflict with the good faith intent of the Club in granting a conservation easement on its land surrounding Christine Lake to augment protection of the watershed agreements, and threaten the quiet enjoyment of traditional recreational users, especially hikers like myself and my family who treasure our time in the woods.

Creation of these ATV trails is inconsistent and incompatible with the original 1995 management plan and the primary reasons for creation of the State Forest 1) to ensure that the property continues to contribute to forest economy through the sale of wood products, 2) to provide continued public access for traditional recreational uses, and 3) to protect the Nash Stream watershed's natural beauty and ecological values. Heavy ATV use in the Nash Stream Forest will cause significant environmental damage to streams, sensitive natural areas and wildlife communities that will impact the ability of future generations to enjoy and appreciate New Hampshire's greatest asset, its beautiful forests, unique ecosystems, and magnificent wildlife.

I am appealing to you and the state to honor the vision in the original master plan and not allow additional ATV trails in Nash Stream Forest.

Sincerely yours, **Jessie McGinley**

Prospect Lodge
321 Summer Club Rd.
Stark, NH 03582

12904 Dean Road
Silver Spring, MD 20906
301-946-3176

Guinn, William

From: Jeremiah Macrae-Hawkins <bullfrog_03584@yahoo.com>
Sent: Thursday, March 02, 2017 9:56 AM
To: DRED: Nash Stream Plan
Subject: No more ATV expansion in Nash stream!

I am against ATV trail expansion in Nash stream for many reasons.

Beyond the obvious reasons of trail erosion, environmental degradation, air pollution, noise pollution, lack of planning, and a general lack of respect from ATV riders. Quality of life in Coos county is the main reason.

The introduction of many ATV's in one town has huge effects on the neighboring towns and rural areas. The spill over of ATV traffic into surrounding woods, mountains, and towns detracts from the quality of life that many of us live here for. When Berlin decided to open up everything they could to ATV's Gorham and other local towns suffered. My wife and I have moved west (Lancaster) out of the Berlin Gorham area for this reason. And now we find ourselves under the gun again as ATV clubs push to expand trails in Nash stream. These new trails will lead to more unchecked expansion until the residents of Lancaster find themselves in the same boat as there neighbors to the east, there beloved town over run with ATV's.

As for the narrow sighted view that "ATV's are the future of Coos". Wrong! The future is being stifled by un-managed ATV expansion. The young active community members that don't want this in there backyards will simply move away. How do I know this? My wife and I are both young professionals, active in our local community's, potential home buyers, and promoters of several local events (Randolph Ramble, Moose Brook Fat Bike Race, and a soon to come community running event in Lancaster). If ATV expansion continues as it has we will most likely pack up and move.

Are ATV's the economic engine of Coos? Lets see some numbers to prove this claim. The reputation is getting out that Coos is crowded with ATV's on the weekend..... stay away go somewhere else unless you are on an ATV. ATV's may push out as many visitors as they bring in. Below are links to several thread posts warning of Coos, and they're from motor heads, which I admittedly am.

<http://advrider.com/index.php?threads/hampster-ride-dirt-route-the-length-of-new-hampshire.981534/page-26>

<http://advrider.com/index.php?threads/hampster-ride-dirt-route-the-length-of-new-hampshire.981534/page-29>

I can only imagine there are more forums on the web that warn of the ATV scene in Coos.

The footprint of ATV's is much larger than environmental, it is also a quality of life issue, and a social one, its tearing local community's apart.

Are we so destitute in Coos we'll let any motorized recreational fad move into town? Regardless of consequences.

-Jeremiah Hawkins

Guinn, William

From: Bond, Richard (Rick) (CFM) <Richard.Bond@va.gov>
Sent: Thursday, March 02, 2017 11:57 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream ATV Oppose
Attachments: Nash Stream ATV - Oppose.pdf

Dear Director Simpkins, attached please find my letter opposing expansion of ATV trails in the Nash Stream State Forest. I understand that this is a most contentious issue, and I hope that you will thoughtfully consider my input and perspective in your decision process.

Thank you

Richard Bond, AIA

Rick Bond, AIA
Director, Facility Planning Support, Eastern Region
Construction and Facilities Management
Department of Veterans Affairs
8380 Colesville Road
Silver Spring, Maryland 20910

Richard.bond@va.gov
(240) 494-2963

RICHARD L. BOND, AIA

1 March, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

As a young child and teen, I grew up hiking the many trails, parks and mountains and swimming and paddling the lakes of New Hampshire, guided by the Boy Scouts, summer camps and the YMCA. Through this exposure, I gained an appreciation for the beauty of your State, and a respect for the environment, and all who endeavor to protect our threatened wilderness. Years later, after travelling the globe with the Army, I encountered Christine Lake, and its vast, virtually unspoiled surroundings. As an architect and designer, my exposure to the world heightened my sense of awareness of the environment, and provided many touchpoints of what "beauty" looks and feels like. This is such a place. I have been blessed to have been able to visit Christine Lake for more than 35 years, through the gracious generosity of families who have a dedication to the preservation of the sense of place. Through my "world view", Christine Lake, and its surroundings, is unique in the world, and should be treasured.

As a businessman and government official, I can understand the fiscal attraction that opening trails on the Nash Steam affords to an economically depressed area. But such a tempting shot in the arm is short lived...like a hit of a drug. Once the immediate impact is felt, people will be left wanting for "more". Once released, this genie cannot be returned to its bottle. Every decision, however well founded it may appear on the surface, has unexpected second and third order consequences. The damage to the physical environment and, more subtly, but no less impactful, to the auditory environment will be irreparable - and politically irretrievable. The stillness and tranquility will be lost. The sense of virgin wilderness will be defiled. And people who come to enjoy and worship that space will also be gone...as will their economic contributions.

I don't begrudge the proponents of increasing access for ATVs, nor question their intentions - they would argue that they need "their" space, and deserve consideration. But some areas are more appropriate to develop for this type of activity than one which was purposefully, and quite thoughtfully and respectfully, created for the purpose of preservation and protection from such environmental "insults". The men and women who worked with the State to create this wilderness made deliberate decisions, and concessions, to ensure its preservation in perpetuity. They agreed with the State to limit noisy motorcraft for the very same reason that motor vehicle traffic and ATVs should not be permitted in this area. They agreed to open lake access to the public, so that they, too, could enjoy this incredible

RICHARD L. BOND, AIA

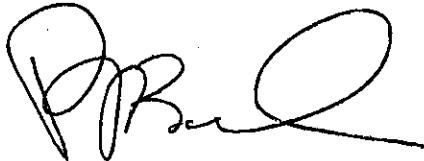
treasure. I used to miss the motorboats, the excitement and the excitement of waterskiing. But with time, I have learned to appreciate the silence. There are many places one can waterski, or ride an ATV, but there are increasingly few where one can virtually forget "civilization".

The principal advocates for the conservation easement, who generously donated vast amounts of their cherished land to the State, are now gone. But this is their legacy to the State, to residents and visitors alike, and to the movement to protect land before it is too late. Beware of those second and third order consequences. Once you dishonor those who offered this land in good faith, and for mutual benefit, your next donors may not be so generous or accommodating. Once it becomes public knowledge - and it will - that the government broke its promise to protect these lands, new partners will be hard to find. As a result, the long term goals of the State, and your Department, could well be undermined by the decision you make here.

I implore you to make the right decision. For the Nash Stream Forest, for the State Park System, for the reputation of the State as a good faith partner and its stature as a protector of the environment, and for the Environment itself.

Don't let it become "too late". Don't expand access to the Nash Stream Forest to ATVs.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Bond', with a large, stylized flourish at the end.

Richard Bond, AIA, FHFI, MBA
Kensington, Maryland

Guinn, William

From: Abby Evankow <abbyaustin@myfairpoint.net>
Sent: Thursday, March 02, 2017 12:19 PM
To: DRED: Nash Stream Plan
Subject: Please withdraw the proposed 2017 Nash Stream Management Plan

Dear Director Simpkins,

Please withdraw the 2017 Nash Stream Forest Management Plan. The authors of this plan have failed to identify any need for such a radical revision to the original, exemplary 1995 plan.

It fails to follow the 1995 Revision Process Directive It fails to establish monitored control areas.
It fails to address Climate Change.

Any revisions must be based on documented need as well as the original intent of managing to "Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes. Use and build upon, rather than work in opposition to ecological principles and natural tendencies. Manage the land with as little interference as possible with natural ecological functions." (1995, pg 61)

Please start a new revision process with a representative public committee that:
Reaffirms the 1995 Plan until a revision is adopted Follows the 1995 Plan Revision Process Directive Bases any changes in the Nash Stream Management plan on clear data and documentation.
Evaluates any proposed revision through the lens of Climate Change.

Establish ~200 acre control area of predominate hardwood stand.
Establish 1500 acres control area of predominate softwood stand.

Suspend all Timber Management until these control areas are fully designated and protected and the monitoring system is established.

Reaffirm the 1995 Management Vision to: "Manage Nash Stream Forest as a model of ecologically-based forestry, emphasizing the growth of long-rotation, high quality, solid wood products that contribute to the economy of northern New Hampshire." (1995, pg 61)

Retain the 1995 plan directive of using "uneven-aged management as the preferred method for managing and regenerating timber stands."

Cultivate old growth timber stands as a new forest product - carbon offset credits.

Reject the 2017 goal of "maintaining current levels of natural community and plant species diversity." (2017 pg 35) The current level of biodiversity is that of a young, biologically impoverished forest, not the rich diversity of complex old growth areas.

Stop further development of OHRV trails. These high impact trails do not fit with the original purpose of "Continue (ing) to offer public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas." (1995, pg 61) The construction of yet more OHRV trails is also in direct conflict with the 1995 Plans direction that logging roads "will consume an absolute minimum of area."

Public lands should be managed to provide services that private lands fail to provide reliably. Today there is an over-abundance of early-successional forest habitat and a deficit of late successional habitats for preserving biodiversity. New Hampshire's Nash Stream Forest has a responsibility to provide late successional habitat.

Sincerely,
Abby Evankow
6 Loups Garou Rd
Gorham, NH 03581
603-466-3037

Guinn, William

From: Kevin Graham <keving@yhm.net>
Sent: Thursday, March 02, 2017 1:26 PM
To: DRED: Nash Stream Plan
Cc: feedback@nashstreamforest.com
Subject: Nash stream OHRV trails

Good afternoon,

I'm writing in regards to the proposed changes and possible closure of the Nash Stream Forest OHRV trails. I feel that closing the existing trail system would be very detrimental to the local economy and bordering communities who rely on the revenue generated by OHRV enthusiasts. As a resident of Pittsburg and a fellow OHRV rider and Snowmobiler I know that many families are supported by the income generated by the Off road community. I feel that the OHRV trails and Off road community should be embraced as the trail system is still relatively new and the full potential of the benefits for the local communities have yet to be seen.

I personally embrace the idea of creating new trails for OHRV enthusiasts and families to come and enjoy the great state of New Hampshire and help the community thrive. Much of the reason I relocated to Northern New Hampshire is due to the OHRV trails that are available and allow many towns and communities to be interconnected via an amazing trail system.

Thank you for your consideration.

-Kevin Graham

Guinn, William

From: Michael Kellett <kellett@restore.org>
Sent: Thursday, March 02, 2017 2:11 PM
To: DRED: Nash Stream Plan
Cc: Jym St. Pierre; Ken Spalding
Subject: Comments on 2017 Nash Stream Forest Draft Management Plan Revision
Attachments: RESTORE_Nash_Stream_2017_draft_plan_comments.pdf; ATT00001.htm

March 2, 2017

Director Brad Simpkins
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

RE: Comments on 2017 Nash Stream Forest Draft Management Plan Revision

Dear Mr. Simpkins:

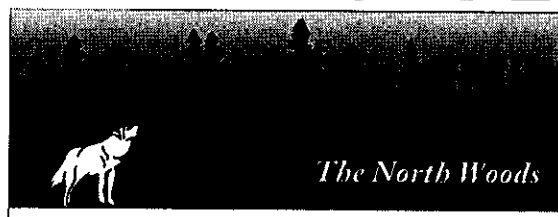
Attached are my comments, on behalf of RESTORE: The North Woods, regarding the 2017 Nash Stream Forest Draft Management Plan Revision. Thank you for the opportunity to comment.

Please feel free to contact me with any questions.

Sincerely,
Michael Kellett

Michael J. Kellett
Executive Director
RESTORE: The North Woods
9 Union Street
Hallowell, Maine 04347
(978) 392-0404
(978) 618-8752 cell
kellett@restore.org

RESTORE:



March 2, 2017

Director Brad Simpkins
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

Submitted via email to nashstreamplan@dred.nh.gov

RE: Comments on 2017 Nash Stream Forest Draft Management Plan Revision

Dear Mr. Simpkins:

The following are comments on the 2017 Nash Stream Forest Draft Management Plan Revision. I am submitting these comments on behalf of RESTORE: The North Woods, a regional nonprofit organization with members in New Hampshire, across New England, and beyond. I was an original member of the Nash Stream Forest Citizen Advisory Committee, appointed in 1989 by Governor Judd Gregg, and was actively involved in developing the original Nash Stream Forest Management Plan, issued in 1995.

The 2017 Nash Stream Forest Draft Management Plan Revision (2017 Draft) is unacceptable for a number of reasons. It replaces the ecologically oriented approach of the 1995 Nash Stream Forest Management Plan (1995 Plan) with a timber-first approach. It was written by the very people who will carry it out — a conflict of interest — with little involvement of the public. It disregards the need to mitigate climate change and to address the impacts of climate change. It perpetuates the failure to implement monitoring and designation of control areas that were mandated in the 1995 Plan. The 2017 Draft should be withdrawn and a new process should be initiated, which is ecologically based and fully involves the public. In the meantime, management of the Nash Stream Forest should be governed by the 1995 Plan, which is more relevant than ever.

The 1995 Plan took a number of years of hard work to develop. This plan was based on sound science and was focused primarily on protecting and restoring the health of the Nash Stream ecosystem. It had a strong preference for restoring older forest age classes and ecosystem integrity. The plan used primarily uneven-aged timber management strategies, such as single tree and small group selection. The 1995 Plan allowed clearcut logging, but this ecologically disruptive approach was strongly discouraged except where absolutely necessary.

The planning process for the 1995 Plan was open and transparent, ensuring full public review and input. I did not agree with everything in the 1995 Plan. However, I believe that it did an excellent job of balancing a wide array of issues and concerns important to the management Nash Stream Forest.

The 2017 Draft represents a radical departure from the exemplary 1995 Plan. The 2017 Draft returns the still very young, poorly stocked Nash Stream Forest to heavy, commodity cutting. Although the 1995 Plan allowed clearcut logging where justified, the 2017 Draft makes clearcutting one of its primary timber management strategies.

This weakening of the 1995 Plan is unnecessary and opens the door to serious abuse. Only ten percent of the timber management zone in Nash Stream Forest is older than about 80 years, yet the 2017 Draft would intensify cutting. This means that the few older trees — the core of the older future forest envisioned in the 1995 Plan — could be threatened with heavy cutting. Or, it could mean that the plan envisions cutting small “junk” trees to burn in the Burgess biomass boilers or for other energy production. Given current stocking and markets, those are the main options, and either would result in degradation of the Nash Stream ecosystem.

In contrast to the excellent process that led to the 1995 Plan, Nash Stream Forest managers were allowed to write the 2017 Draft, with no meaningful public oversight or involvement. This undemocratic process not only set a bad precedent, but it also produced an unacceptable plan. This 2017 Draft discards the 1995 Plan, which was focused on protecting ecosystem health, replacing it with a timber production-oriented plan that undermines ecosystem health. Any revision of the 1995 Plan should be developed with the same kind of citizen involvement that guided the 1995 Plan.

Contributing to the timber-production bias of the 2017 Draft is the fact that the New Hampshire Legislature refuses to fund the salary of the Nash Stream Forester. To pay her salary, she needs to cut more trees. This is an intolerable conflict of interest that is built into management of Nash Stream Forest, and it needs to be remedied.

Nash Stream Forest managers assume that horse logging — or presumably any low-impact forestry — is impractical. This implies that the only practical way to log in Nash Stream Forest is via expensive, heavy-impact equipment and by local contractors who are vacuum-cleaning northern New Hampshire forests for wood chips. Here is yet another squandered opportunity to use public lands to showcase exemplary practices. Even if logging is considered appropriate in Nash Stream Forest, there should be a moratorium for several decades to allow the forest to begin to recover older age classes, gain greater habitat complexity, and sequester carbon now — not 50-100 years from now, if ever.

In addition to violating the 1995 Plan’s directive on how to revise management plans (see 1995 Plan, page 135), Nash Stream Forest managers have ignored multiple directives to monitor biodiversity and the impacts of high-impact activities such as logging, and — since the arrival of all-terrain vehicles in 2002 — ATV traffic. More egregiously, they have disregarded the directive in the 1995 Plan to establish a 100- to 200-acre predominately hardwood Control Area and a 1,500-acre predominately softwood control area *in the timber management zone* for the following purposes: 1) to monitor the impacts of timber cutting; 2) to expand the Natural Areas network into the timber management zone; and 3) to allow for scientific research. The 1995 Plan was clear in specifying that the control areas should be established before logging began. (See 1995 Plan, pages 78-80.) Instead, we have twenty years of logging and still no control areas, and, of course, no monitoring.

The 1995 Plan directed that proposed revisions should largely be based on the results of monitoring. There has been scant monitoring, yet radical revisions have been proposed in the 2017 Draft. Documentation of “need for change” has not been provided for these proposed

revisions. Instead we read: "Desired future condition," an outmoded concept that is vague and subjective, not science-based.

The 2017 Draft ignores climate change, other than to refer to it as "so-called 'anthropogenic or human-induced climate change'" (page 88, 2017 Draft). This embarrassing climate change denialism has no place in a supposedly scientific document. In the spirit of denialism, the 2017 Draft does nothing to address climate change, other than to suggest that the Nash Stream Forest budget could be supplemented by selling carbon credits to polluters.

There are a multitude of urgent, climate change-related questions that the 2017 Draft completely disregards. What will be the impacts of expanded ranges of invasives? Impacts on protected natural communities that scatter in different directions on different schedules? On reproduction of climate-stressed species? On high elevation species such as Bicknell's thrush? How will climate stressed species navigate clear cuts and forest fragmentation? What of altered disturbance regimes?

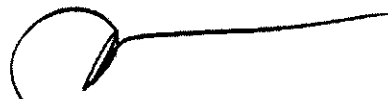
One of the most important questions is: How can we maximize carbon sequestration? Keeping 50 percent of managed forest in seedling, sapling, and pole timber, as "desired" by the 2017 Draft, will release massive amounts of greenhouse gases and worsen climate change. There are probably many other unforeseen climate change issues and threats we ought to hedge our bets on before the next ten-year planning process begins, but the 2017 Draft does nothing to ensure that we are better informed or better prepared to deal with them.

The egregious failure to address climate change in this 150-page document is alone enough reason to scrap the 2017 Draft and start from the beginning. This failure is a glaring indictment of the qualifications of the authors of the draft. We cannot trust these authors to get it right the next time around. We need a completely new plan, drafted by qualified and objective experts, in consultation with climate scientists and ecologists, with full transparency and public oversight.

The 2017 Nash Stream Forest Draft Management Plan Revision is unacceptable and fatally flawed, and it must be withdrawn. A new Citizens Advisory Committee should be appointed to revise the 1995 Plan — not to try to salvage the 2017 Draft. Activities that have not been monitored, in violation of the 1995 Plan — especially timber cutting and ATV traffic — must be suspended until adequate monitoring is in place. The state agency managers who wrote the 2017 Draft should return to their customary role as "Tech Team." They should not be authors of the revised plan, due to their conflict of interest, lack of diverse perspectives, and failure to devise an acceptable 2017 Draft plan.

Thank you for the opportunity to comment on the 2017 Nash Stream Forest Draft Management Plan Revision. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal line extending to the right.

Michael J. Kellett
Executive Director

Guinn, William

From: Al & Judy Hudson <abudson@anthro.umass.edu>
Sent: Thursday, March 02, 2017 2:14 PM
To: DRED: Nash Stream Plan
Subject: Comments on the 2017 NSF management plan. ATTN: Brad Simpkins

Dear Mr. Simpkins,

I am urgently concerned about the imminent dangers to our planet posed by climate change. I am writing this comment to urge your committee to table the 2017 Nash Stream Forest plan because it is recommending drastic alterations to the original 1995 agreement when this land was taken over by the state of NH.

I strongly support Jamie Sayen's comments and recommendations in *Analysis of the Proposed 2017 Draft Revision of the 1995 Nash State Forest Management Plan*. Sayen's has hit upon several crucial issues, among them the failure to execute various provisions set down in the original agreement, especially those involving the establishment of old-forest preserves and monitoring systems to assess changes in the forest.

As a long-time hiker in the White Mountains and NH property owner, I ask you:

—to value concern for the fate of our planet over short term alterations in the plan that would accelerate the dangers that global warming presents to all life on earth;

—to honor one of the precepts in the 1995 plan, "**Continue to offer public access** for traditional, **low impact**, dispersed recreation including hunting, fishing, hiking and snowmobiling in designated areas," and

—to restrict any expansion of ATV access in the NSF.

Sincerely,

Judith Hudson

Randolph, NH

Guinn, William

From: Cam Bradshaw <cambradshaw58@gmail.com>
Sent: Thursday, March 02, 2017 3:19 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream management plan.

I urge the Division of Forest and Lands to reject the 2017 Draft plan and return to the original, exemplary plan and make any changes through the lens of climate change and based on data-driven, documented need.

I pretty much agree with Jamie Sayen's critique.

Thank you for the opportunity to comment.

Cam Bradshaw

Berlin, NH

Guinn, William

From: Jamie Sayen <jrcs.triton@gmail.com>
Sent: Thursday, March 02, 2017 3:26 PM
To: DRED: Nash Stream Plan
Subject: Sayen-Comments on NSF Draft Revision
Attachments: Comments on the 2017 Draft Revision of the.docx; ATT00001.htm

Brad Simpkins, Director

NH Division of Forests and Lands

172 Pembroke Road

Concord, NH 03301

Re: Comments on the draft 2017 Nash Stream Management Plan

Dear Director Simpkins

Attached are my comments on the 2017 Draft revision of the 1995 Nash Stream Forest Management Plan. I regret the necessity of submitting such lengthy comments. However, my careful reading of both documents identified a great many issues and proposed alterations to the 1995 Plan that I believe required comment, including quoting the pertinent passages from either or both documents, and providing documentation of statements I have offered in support of my recommendations on pages 19-22.

Thank you and all others who read my comments for your perseverance and patience.

Sincerely,
Jamie Sayen
Stratford, NH

JAMIE SAYEN
111 BORDEAU ROAD
N. STRATFORD, NH 03590
603 636-2952
jracs.triton@gmail.com

COMMENTS ON THE 2017 DRAFT REVISION OF THE 1995 NASH STREAM FOREST MANAGEMENT PLAN

Submitted by Jamie Sayen, March 2, 2017

I live about five miles from the Nash Stream Forest (NSF). One-third of NSF lies in my town of Stratford, where I serve as Town Moderator. Some of my most cherished memories are associated with Nash Stream, including: climbing North Percy Peak in August with my young son to pick blueberries; snowshoeing to its summit in winter; swimming in the chill waters of Pond Brook Falls, and exploring the washed out Nash Bog Dam and the recovering forest where the Bog had been prior to the 1969 Flood.

As a reporter for the *Coos County Democrat* in 1988, I broke the story of the impending sale of the Nash Stream as part of the Diamond Land Sale. It was the first of the blockbuster paper company land sales between 1988 and 2005 that transformed the landownership patterns of northern New England and served as an early warning of the approaching collapse of the region's paper industry. I participated in the public process that produced the 1995 NSF Management Plan that is currently under revision. I have been engaged in conservation issues in northern New Hampshire and northern New England for over thirty years. I care deeply about the magnificent 40,000-acre watershed a short flight (for a raven) from my cabin.

Timely Revisions are Necessary and Appropriate: Even excellent Plans require periodic updating and appropriate revisions. Examples of necessary revisions include:

- Data and information derived from inventory, monitoring, and research since the Plan (or most recent Revision) was implemented. Examples in the 2017 Draft include: additions to the NSF since 1995; data from timber management, and ATV use.
- Important new developments, such as: Trout Unlimited's stream restoration work (page 80), the Coos Trail (mentioned several times on pages 123-136), and the impressive "Cultural Resources" section (pages 38-42).
- Important issues currently not addressed or not adequately addressed. The most urgent issue not addressed by the 2017 revision process is anthropogenic Climate Change.
- Evaluation of the Plan's effectiveness in meeting the management direction provided by the Vision.

However, proposed changes in the basic vision and management philosophy should not be entered into lightly or without a rigorous public process in which ample supporting documentation of need for change is supplied. My comments are offered in this context: *revision is appropriate to reflect change when amply documented; major alterations in the vision and spirit of the operative plan must meet a higher standard of rigor, documentation, and public process.*

ROLE OF PUBLIC LANDS & THE 1995 NSF MANAGEMENT PLAN

Public lands are bought, owned, and managed by the public. The owners are not seeking a return on investment. Public lands are not intended for re-sale for any reason. Therefore, the aims of the “owners” are fundamentally different from those of private owners. A public lands management plan must provide services that are not reliably provided by private landowners.

Then-Governor Judd Gregg understood this when he established the Nash Stream Advisory Committee (NSAC) in 1989 to develop a management plan for the NSF. The exemplary, transparent, public process of the NSAC produced an excellent Nash Stream Forest Management Plan in 1995 that stated: “The Management of Nash Stream Forest will be a model of environmentally sound public land stewardship.” (1995, p. 61, hereafter: 1995:61) *The 1995 Plan remains the governing document for management of the Nash Stream Forest and the governing document for the entire revision process.*

The first item in the 1995 Management Vision read: “Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes. *Use and build upon, rather than work in opposition to, ecological principles and natural tendencies. Manage the land with as little interference as possible with natural ecological functions.*” (Emphasis added) (1995:61) This elegant expression of the “precautionary principle” directs the public and public agencies to allow natural processes to “manage” the forest “with as little interference as possible.” This leaves abundant room for managers to inventory, monitor, and conduct research on the NSF Watershed, and to implement management policies and actions that nurture this “natural management.”

Major elements of 1995 Plan that have been implemented:

- In 1997 timber cutting resumed on a forest so poorly stocked in 1988 that a savvy timber investor declined to pay more than \$100 an acre for the Nash Stream Watershed.
- Objective 5 of Fisheries Resources (page 72) stated: “Implement a program for stream habitat protection and/or enhancement for indigenous wild fish populations.” An important stream restoration project is ongoing.

Major Alterations of the 1995 Plan: The banning of ATVs was reversed in 2002. The termination of camp leases by 2039 was deleted at the same time.

Major Elements of the 1995 Plan not Implemented as of 2017:

- Control Areas in the timber management zone (1995:80);
- Inventory of forest resources (1995: 130-135);

- Monitoring (1995: 130-135);
- Directives for the revision process for the NSF Management Plan (1995: 135)

DISCUSSION OF NON-IMPLEMENTATION OF ELEMENTS OF 1995 PLAN

Control Areas: The 1995 Plan required the establishment of “Control Areas” in timber management areas, where cutting was prohibited: “Control Areas: Once the natural community classification is complete, a control area will be established within each identified natural community. These control areas will remain largely unaltered by human activity, with the exception of non-destructive vegetation sampling techniques. The primary purpose of control areas is to serve research and educational needs. For example, the areas can be used to contrast changes in vegetational composition and structure of control areas to areas in which active management is occurring. An additional purpose for establishing control areas is the preservation of plant and wildlife habitat, including examples of natural community types not represented in natural preserves due to the level of past human impacts. In this manner, control areas will contribute toward the goal of preserving examples of all community types, regardless of current condition, and in anticipation of a future condition where natural processes prevail.” (1995: 78-80) **Note: this entire section has been deleted and the term “Control Area” cannot be found in the 2017 Draft.**

The Plan recommended 100-200 acre Control Areas for predominately hardwood stands, and 1500 acres for predominately softwood stands. (1995:78, 80) The failure to establish lower elevation Control Areas is a major setback to vital monitoring obligations, and an equally significant setback for preserving older, unfragmented, high productivity sites.

Inventory: Up-to-date forest inventories are essential elements of the low impact, uneven-aged timber management directives of the 1995 Plan. (See Table 24; 1995:132) After twenty years of logging, there have been no inventory updates. This is troubling and unacceptable.

Monitoring: Monitoring was a high priority for the 1995 Plan: “Much is still unknown about the ecology of the NSF which presents a unique research opportunity to the ecology, forestry, recreation and wildlife research communities. Monitoring and research should be a high priority to gather information for wise long-term planning. (A) Research should encourage projects to more thoroughly inventory the NSF and to assess the impacts of past intensive forest cutting and recreation on ecological conditions, forest regrowth, and wildlife populations. (B) A monitoring system should be established to determine and evaluate the impacts of present management activities.” (1995:64) **Note: This passage has been deleted from 2017 Draft.**

There has been little, if any, systematic monitoring of the ecological impacts of such heavy impact activities as timber management and ATV traffic. The 1995 Plan called for effective long-term monitoring of management and uses of the NSF and directed that proposed revisions of the plan be supported by evidence gathered from monitoring. (1995:61, 135) The 2017 Draft proposes radical alterations to both the Vision and the Management Plan, but offers scant documentation from Monitoring or other objective

sources. Most of the monitoring directives in the 1995 Plan have not been carried out, even as the 2017 Draft proposes an expansion of even-aged cutting and an abandonment of the 1995 Plan's commitment to growing older forest stands.

Revision: The 1995 Plan was explicit in its directive for the revision process: "The Management Vision is considered a timeless document but nonetheless a dynamic one, subject to change should the management direction it provides be considered inappropriate.... The process of changing either the Vision or the Management Plan would be as involved as that which created them. It is anticipated that public comments and/or an advisory committee would be required to consider new information, including changing conditions and trends. *Monitoring should provide the necessary means to help identify and document the need for change in management practices.*" (1995: 135 emphasis added) **This statement has been deleted in 2017 Draft.**

In addition to deleting the above statement, the revision team ignored its directives:

- The team provided no information on the 2017 Revision Process. In conversations with DFL I have learned that the agency managers (who served so ably as the Tech Team during the 1995 Plan process) have supplanted the public, very representative committee of the 1990s. Several years ago, the Citizens' Committee (whose membership has since changed significantly) reviewed drafts, but did not otherwise participate in the revision process.
- Public comments were solicited only at a very late stage in the process. The 1990s NSAC convened public hearings in Groveton and Concord in April 1990 to solicit public input at the very earliest stage of the process. (1995:157-160) It kept the public informed and involved throughout the process.
- Monitoring directives have not been implemented. Accordingly, there is scant monitoring data to "help identify and document the need for change."
- Little, if any, documentation has been provided to justify the radical changes proposed to the vision or to the timber and wildlife management chapters. Likewise, no documentation is offered to justify the deletion of several statements that form the core plan's vision for protecting the ecological integrity of the NSF. *The Authors of the 2017 Draft revision have failed to make a case for the "need" for such a radical revision of an exemplary 1995 Plan. Accordingly, the 1995 Plan remains operative, except where adequate documentation of the need for change has been supplied.*

The Authors of the 2017 Draft are the managers of the NSF, not the representative revision committee called for by the 1995 Plan. There is a clear conflict of interest when public servants are allowed to write their own management directives.

CONTEXT IN WHICH NSF MANAGEMENT PLAN IS TO BE REVISED

The Revision Team must be especially mindful of the sixth element of the 1995 Management Vision: "Manage Nash Stream as an integral part of the ecology, landscape,

and culture of the northern forests of New Hampshire and New England.” (1995:61) Nash Stream is owned by all citizens of New Hampshire and the United States (thanks to a conservation easement administered by the USFS). NSF plays an extremely important role in the ecology, culture, and economy of Coos County, New Hampshire, New England, and eastern Canada. There are three major issues that shape the context in which the NSF Plan revision process plays out:

1) The Condition of the Region’s Forests: At the time of sale to State of New Hampshire, a leading NH timber investor, Henry Swan of Wagner Woodlands, concluded the Diamond lands were so heavily cut over that they were worth only about \$100 an acre as a timber investment.

The 1988 forest inventory (see 1995:25-29) found that 87 percent of the trees in NSF were less than 50 years old and almost 90 percent of the trees were four inches in diameter or smaller. One-third of the NSF was seedling and sapling (less than 4.5 inches dbh), and three-quarters of these trees were shade intolerant and early successional species of significant ecological value, but limited economic value. Only 11 percent of the stocking was in the sawtimber class, and, the 1995 Plan noted, most was “generally just above the poletimber size class.” Less than 10 percent of the hardwood sawlogs were “high grade.” The remainder were medium to low grade. The NSF stocking was as low as the intensively cut former paper company lands in northern Maine.

Fewer than four trees per acre were larger than 16 inches in diameter. (1995:26) Red spruce had been an important component of the lower elevation NSF in pre-settlement times. Table 6 (1995:36) showed there were zero acres of softwood type sawlogs in the NSF in 1988.

The NSF is nearly thirty years older today, but it is still a very young forest. Heavy cutting of its small sawlog class in the near future will retard the 1995 Plan’s goal of restoring a much older forest.

It is important to appreciate how radically different the NSF of 1988 and today is from the forests encountered by loggers nearly 200 years ago. Ecologist Craig Lorimer has estimated that 59 percent of the pre-European settlement forests of northeastern Maine were greater than 150 years of age, and 27 percent were more than 300 years old. Lorimer and Alan White also estimate that only about 2.5-4.5 percent of Maine’s pre-settlement forest was covered by seedlings and saplings. Their findings are consistent with the composition and structure of the pre-settlement forests throughout northern New England. The 2017 Draft’s “Desired Condition” for the Nash Stream Forest is for roughly 25 percent to be seedlings and saplings and few trees older than 100-120 years. (2017:64)

Natural disturbance events that primarily kill single trees or very small groups of trees, created gaps in the canopy ranging from about 500 square feet (1/100th of an acre) to about 2000 square feet (1/25th acre). Less than one percent of the gaps

caused by ice or wind storms, insect infestations, or disease were greater than one acre.¹ Habitat diversity and complexity was greatly enhanced by large dead wood—standing dead trees, fallen trees, and coarse woody debris. Large deadwood comes from trees that have lived at least 170 years before dying. Today only 0.4 percent of the current forestland in the northeastern United States is covered by old growth.

2) Coos County is in a Protracted Economic Crisis: The Diamond Land Sale in 1988 marked the beginning of the demise of northern New Hampshire's paper industry and the near-collapse of Maine's paper industry. The closing of paper mills in Groveton and Berlin between 2005 and 2007, exacerbated by a lack of economic diversity, plunged the region into a severe depression from which we have not emerged.

In my oral history of the Groveton paper mill,² former mill managers explained the causes of the mill's demise (and the decline of northern New England's paper industry). Most significant were: high energy demand, coupled with soaring energy prices; low commodity paper prices and competition with newer faster mills in places that paid lower wages and operated under lax (or non-existent) environmental and labor protections; and absentee ownership. Decisions to deny investment, to sell, or to close mills were made on Wall Street, not Main St., by owners with no commitment to local communities. The lack of regional economic diversity has kept us depressed for a full decade following the mill closures.

While we remain part of the global economy that failed this region, we will be wise to take steps to reduce our vulnerability to the global forces that brought down the regional paper industry. We should promote: more local ownership; businesses and services that require less energy (less vulnerability to global energy markets and lower carbon footprint); and a commitment to manufacture a diverse array of niche products that add high value to our natural resources. We must avoid commodity production because we cannot win in that global game that invariably degrades forests.

The Nash Stream, although only four percent of the area of Coos County, can play an outsized role in helping to develop a low carbon-footprint, local economy that produces high value, niche wood products and offers recreation and tourism services that cannot be supplied by other regions. The 1995 Management Plan pointed the NSF in that direction; the 2017 Draft turns the focus of management back in the direction of global commodities.

¹ Marc Lapin, "Old Growth Forests: A Literature Review of Eastern North American Forests," Vermont Natural Resources Council, 2005, p. 5. <http://vnrc.org/wp-content/uploads/2012/08/VNRC-Old-Growth-pub.pdf>.

² *You Had a Job for Life* will be published by University Press of New England in December 2017.

3) Climate Change: See next section.

CLIMATE CHANGE

Climate Change poses the greatest long-term environmental, economic, social, and cultural threat in human history, especially if humans continue to dither instead of aggressively change their energy and land management policies and other behaviors. Iconic species, such as sugar maple, moose, and red spruce, as well as paper birch, aspen, loons, and lynx, could disappear from northern New Hampshire and the NSF region in the next couple of centuries if carbon emissions remain unchecked. The recent revision of the Conte Wildlife Refuge Plan offered a comprehensive analysis of climate change. The 2017 Draft revision does not analyze how NSF could be managed to maximize carbon-sequestration. It fails to address the need for un-fragmented, high-quality habitat for climate-stressed species that need to adapt via behavioral changes and/or evolution, or migrate to more suitable climates.

Climate change potentially impacts nearly every aspect of the NSF Management Plan. The following sections offer some thoughts about why it is imperative that the NSF Plan address climate change comprehensively.

Carbon Sequestration & Old Growth Forests: Old growth forests sequester more carbon than any other forest age class. Soils sequester more carbon than above ground biomass. Globally, the world's forests sequester roughly 30 percent of the annual anthropogenic carbon emissions, which is roughly equivalent to the annual carbon-sequestration capacity of oceans. More carbon is stored in forests than is contained in the atmosphere. Old growth stands store the greatest amount of carbon sequestered per acre of any successional stage. A study found: "Biomass approached maximum values when in stands with dominant tree ages of 350-400 years."³ There is a growing realization that allowing forest stands to mature *toward* old growth conditions maximizes a stand's carbon sequestration capacity.

Managed forests sequester significantly less carbon than very old stands. Following intensive logging, sunlight warms and dries soils. Decomposers become more active under warming conditions, and greenhouse gas emissions from soils increase. Following especially intensive logging operations, such as whole tree harvesting (WTH) to produce wood chips for mega-biomass boilers, soils may require half a century or more to recover the carbon released during and after an intensive cut. *There is an urgent need for forests to sequester maximal amounts of carbon now, not in another half century.*

³ William S. Keeton, Andrew A. Whitman, Gregory C. McGee, and Christine L. Goodale, "Late-Successional Biomass Development in Northern Hardwood-Conifer Forests of the Northeastern United States," *Forest Science* 57(6) 2011, p. 489.
http://www.uvm.edu/rsenr/wkeeton/pubpdfs/Keeton%20et%20al.%202011_Forest%20Science.pdf

To maximize forest carbon sequestration, we can expand reserves and practice Low Impact Forestry in managed stands. Reserves sequester more CO₂, and improved forest practices release less CO₂. Also, we can focus on the production of high value, large sawlogs that continue to sequester carbon long after they are cut and converted into high value products, whereas chips release stored carbon when burned in biomass boilers.

Impact on Tree Species if CO₂ Doubles: CO₂ levels have surpassed 400 parts per million (ppm) in the atmosphere. If they reach 550 ppm (a doubling of pre-Industrial Revolution levels), fir, aspen, and paper birch may become rare or even extirpated from northern New England in the coming centuries. The range of spruce-fir forest communities may shift 300 miles to the north. The NSF's exemplary high elevation spruce-fir stands will be forced to migrate uphill, until they are forced off the summit of their mountain. Sugar maple is projected to lose virtually all its potential northern New England habitat. Beech could lose 90 percent of its current range. Yellow birch likely will retain only small portions of its current range.⁴

Impacts on Poorly-Studied Forest Species: The near-elimination of old growth has negatively impacted many species that flourished in older forests, including invertebrates, mosses, and lichens. Potential impacts of climate change on poorly-studied species are likewise unknown.

Lessons from Post-Glacial Migrations: Research in recent decades has taught us much about the re-forestation of areas that were covered by glaciers. While cultural and ecological conditions are quite different today, those findings can provide us with important insights about how climate-stressed species may respond to climate change, and how we might mitigate the threat climate change poses to their survival. Important findings include:

- Tree migration rates averaged 150-500 meters a year. Many forest herb species only travel at two or three meters a year. At current rates of warming, species may need to migrate at rates significantly greater than one kilometer a year.
- Today's natural communities will likely disassemble as different species migrate at different speeds and in different directions beyond the boundaries of small designated natural areas.
- Migrating climate-stressed species will encounter far greater obstacles in today's highly fragmented landscape.

⁴ Louis Iverson, Anantha Prasad, Stephen Matthews, "Potential Changes in Suitable Habitat for 134 Tree Species in the Northeastern United States," *Mitigation and Adaptation Strategies for Global Change*, 2008. Louis R. Iverson, Anantha M. Prasad, "Potential Redistribution of Tree Species Habitat Under Five Climate Change Scenarios in the Eastern US," *Forest Ecology and Management*, 2002, vol. 155, pp. 205-222.

- Climate-stressed species may only have decades or a few centuries to adapt or perish; post-Pleistocene species migrations occurred over the course of several millennia.

Other Climate Change Questions:

- What will be the impacts on cold water fish and other aquatic organisms?
- The 2017 Draft worries about the threats posed by invasives, but fails to ask how climate change, coupled with increased fragmentation due to increased reliance on even-aged management, will exacerbate and accelerate the threats of invasives in the Nash Stream?
- How will changes in timing of pollination, reproduction, migration, and predator-prey relationships caused by climate change, impact ecosystem integrity and the fates of climate-stressed species?
- How will forests recover from natural and human disturbances?

MANAGING FORESTS IN AN ERA OF ANTHROPOGENIC CLIMATE CHANGE⁵

Forest climate scientists expect major ecosystem impacts due to climate change: “Climate change is projected to alter the distribution, composition, and function of forests at regional scales.” (Wang) They recommend the reduction of greenhouse gases via carbon sequestration and reduction of carbon emissions (including via soil disturbances during heavy-impact logging). (Millar)

Forests are adaptive and dynamic, not static or stable. Forest management (from timber operations to biodiversity preservation) should aim to facilitate accommodation and adaptation rather than attempting to resist change. (Puettmann; Millar) Puettmann writes: “... managing forests as complex adaptive systems shifts the emphasis of silvicultural manipulation away from direct aspects of productivity and toward resilience and the facilitation of the ecosystems’ ability to adapt, i.e., respond to a wide variety of changes in conditions.” He recommends forest management plans should be evaluated for “adaptability and resilience.”

The forests of northern New England (and indeed in northeastern US) are very young; nearly 80 percent are between 40 and 80 years old. By contrast, roughly 60 percent of pre-settlement forests were 150 years or older. This means that our region’s forests are

⁵ The following discussion draws upon: Duveneck, Matthew J., Jonathan, R. Thompson, Eric J. Gustafson, Yu Liang, and Arjan M. G. de Bruijn, “Recovery dynamics and climate change effects to future New England Forests,” *Landscape Ecology*, 31 (5), June 2016. Millar, Constance I., Nathan L. Stephenson, and Scott L. Stephens, “Climate change and forests of the future: Managing in the face of uncertainty,” *Ecological Applications*, 17(8), 2007, pp. 2145-2151. Puettmann, Klaus J., “Silvicultural challenges and options in the context of global climate change: ‘Simple’ fixes and opportunities for new management approaches,” *Journal of Forestry*, September 2011, pp. 321-331. Wang, Wen J., Hong S. He, Frank R. Thompson III, Jacob S. Fraser, William D. Dijak, “Changes in forest biomass and tree species distribution under climate change in the northeastern United States,” *Landscape Ecology*, published online 13 August 2016.

well below maximum biomass and carbon sequestration capacity. (Duveneck) Wang recommends: "...policy-makers may need to consider alternative land-use policies and practices that increase and prolong biomass sequestration..."

Millar states: "Climate variability, both naturally-caused and anthropogenic, as well as modern land-use practices and stressors, create novel environmental conditions never before experienced by ecosystems. Under such conditions, historical ecology suggests that we manage for species persistence within large eco-regions. Such a goal relaxes expectations that current species ranges will remain constant, or that population abundances, distribution, species compositions and dominances should remain stable."

Millar emphasizes the importance of connected (unfragmented) landscapes: "The capacity to move (migrate) in response to changing climates has been key to adaptation and long-term survival of plants and animals in historical ecosystems. Plants migrate (shift ranges) by dying in unfavorable sites and colonizing favorable sites, including internal species' margins. The capacity to do this is aided by managing for connected landscapes, that is, landscapes that contain continuous habitat with few physical or biotic impediments to migration, and through which species can move readily.... Desired goals include reducing fragmentation and planning at large landscape scales to maximize habitat connectivity." *The NSF, along with the White Mountain National Forest, can play a vital role in anchoring such a regional approach.*

Forest modeling of the effects of climate change on forests over time suggests that a century hence, there will be fairly small changes in the dominant tree species because trees are long-lived. However, 300 years hence, as long-lived trees age and die, they may be unable to reproduce in their current habitat due to changed climate conditions. Researchers expect tree species to shift in a northerly direction. Wang predicts significant range contractions and decreased occurrence for the following species of northern New England over the next three centuries: hemlock, fir, black and red spruce, northern white cedar, white and pitch pine, quaking aspen, and yellow birch.

Role of Public Lands Under Climate Change: Public lands such as Nash Stream Forest must provide services that private landowners cannot be relied upon to provide, especially: providing connected landscapes for climate-stressed species (plant, animal, microbes); promoting the growth of older forests to maximize carbon sequestration; minimizing carbon release from soils during timber cutting, and leadership in shifting forest management from a focus on production to management that facilitates adaptation.

Establish a NSF Climate Change Advisory Panel: The establishment of a "climate change advisory panel for NSF" to review management plans and engage in an on-going conversation with NSF managers would greatly assist implementation of essential, progressive climate change management policies. Membership in the advisory panel could be a mix of academics researchers (UNH, Dartmouth, other?) and Low Impact practitioners such as AMC.

1995 Plan Anticipates Forest Climate Researchers' Recommendations: The 1995 NSF Management Plan envisioned a much older forest, with very small openings, minimized forest fragmentation, and a commitment to production of older sawlogs that sequester more carbon for longer periods of time. Under the 1995 Plan, carbon sequestration can be optimized, release of soil carbon during logging activities (especially if performed in winter as the 1995 Plan recommended) can be minimized, and species migration can occur in a less fragmented forest.

2017 Draft revision Undermines Climate Researchers Recommendations: The 2017 Draft revision diminishes the carbon sequestration potential of NSF by keeping the managed forest very young, increasing the size of openings, and increasing potential carbon release from soils by creating larger openings and harvesting in all seasons (except Mud). The larger openings and younger forests present climate-stressed species with a more fragmented, inhospitable habitat through which to attempt migration to a more climate-friendly habitat.

ANALYSIS OF SELECTED SECTIONS OF THE 2017 DRAFT REVISION

The 2017 Draft states: "Though minor changes have been made to reflect changes on the property over the years, the spirit of the vision remains unchanged." (2017:20) The credibility of the 2017 Draft rests, to a significant degree, in the accuracy of this assertion. By contrasting selected sections of the 2017 Draft with corresponding sections in the 1995 Plan, the validity of this statement can be assessed.

Substantive changes to the 1995 Plan must be supported by documentation of a "need to change." Failure to monitor since 1995 severely limits such documentation, and before proposed changes can be considered, the necessary documentation must be secured through rigorous inventory, research, and monitoring. Otherwise, the 1995 Plan must be retained.

FOREST MANAGEMENT

Model Forestry: The 1995 Management Vision stated: "Manage Nash Stream Forest as a model of ecologically-based forestry, emphasizing the growth of long-rotation, high quality, solid wood products that contribute to the economy of northern New Hampshire." (1995:61) In the mid-1990s Nash Stream Advisory Committee member, Charlie Niebling, then Executive Director of the NH Timberland Owners Association, said that solitude and scenery were to be considered "forestry products."⁶ Carbon sequestration is one of the most valuable forest products of the NSF.

Older, less Fragmented Forest: The 1995 Plan called for an older forest with fewer and smaller patches of young forests: "Future management of the NSF will favor older forest and reduce the size of young forest patches in comparison to present conditions. Moose

⁶ Peter Riviere, "Nash Stream Advisory Group Sensitive to Citizen Input," *Caledonian-Record*. A facsimile of the article was appended to the 1995 NSF Management Plan, p. 156. No date for the article was provided, but it probably was in 1994 or 1995.

numbers may decline as the extensive browse available in large clearcuts ages to larger trees. Deer numbers may eventually increase when suitable wintering habitat becomes available in low elevation softwood stands.... Species which reach their highest abundance in seedling stands (Alder flycatcher, American Redstart, Common Yellowthroat, Chestnut-sided Warbler, Mourning Warbler, and White-throated Sparrow) will decline in numbers as the forest ages. Alder Flycatchers and Yellow Warblers, which are essentially restricted to the youngest age class, will continue to find suitable habitat in shrub-scrub wetlands. Birds currently occurring at low densities which are likely to increase as the forest ages include Northern Goshawk, Barred Owl, Pileated Woodpecker, Purple Finch, and Scarlet Tanager.” (1995:48) **This statement was deleted in the 2017 Draft.** The 2017 Plan calls for less than 10% of the managed forest as old trees with few, if any, trees over 120 years of age.

Uneven-aged Management: The 1995 Plan strongly endorsed low impact, uneven-aged management: “Forest management will focus on long rotation, uneven-aged techniques producing stands with big trees and many vegetative layers (high vertical stand diversity). A small percentage of the Forest will be managed to favor shorter-lived species with low shade tolerance, such as aspen and birch.... At present stands less than thirty years old comprise 35% of the area suitable for timber management, and only 10% of this area is older than sixty years. As the Management Plan is implemented, this age structure will shift to a predominance of older, uneven-aged forest stands. As this occurs, many species that prefer younger aged forest stands will experience habitat declines....” (1995:87)

The 1995 Plan directed forest managers to avoid large openings. It recommended that 80 percent of cuts should create openings no greater than 0.04 acres; another 16 percent would not exceed 0.2 acres. (Figure 16; 1995:105)

The above statements have been deleted and replaced with: “Work towards the following desired future condition for forest and non-forest structure and composition to provide suitable habitat for the entire suite of primary and secondary target [wildlife] species:

Regeneration (i.e. seedling)	5-15%
Sapling-Poletimber	30-40%
Sawtimber	40-50%
Large Sawtimber	<10%
Upland Openings	3%” (See 2017:64)

2017 Draft Promotes Even-Aged Management: The 1995 Plan directed: “Use uneven-aged management as *the preferred method* for managing and regenerating timber stands.” (1995:73, emphasis added) The 2017 Draft amended that to read: “Use *even-aged or* uneven-aged management... for managing and regenerating timber stands.” (2017:99, emphasis added to reflect alterations) The 1995 Plan called for using clearcutting only as a last resort: “Clearcutting will be used only when no other silvicultural method will accomplish the desired condition.” (1995:99) This statement has been deleted in the 2017 Draft, replaced by: “Even-aged management will be an accepted silvicultural method.”

(2017:99) Subtle editing in the 2017 Draft opens the door to greater reliance upon larger clearcuts. The 1995 Plan stated: “Cuts will be *relatively small...*” (1995:99) The 2017 Draft deleted the reference to “relatively small” and asserts instead: “Clearcuts will be *appropriately-sized...*” (2017:98, emphasis added)

Today there is an over-abundance of early-successional forest habitat and a landscape-wide deficit of late successional habitats for preserving biodiversity. Public lands should be managed to provide services that private lands fail to provide reliably. New Hampshire’s Nash Stream Forest has a responsibility to provide late successional habitat to help reduce the late successional habitat deficit.

The 1988 Inventory of NSF found that average stocking was less than twelve cords per acre. (1995:28) An old growth stand in Maine supported 70 cords per acre, the White Mountain National Forest averages about 29 cords per acre, and even the overcut former paper company lands in northern Maine averaged 14.3 cords per acre in 2008.⁷ The NSF needs time to recover its older age classes; significant cutting of the few big old trees NSF currently grows will retard the recovery of older age classes.

There are a number of additional troubling alterations in the 2017 Draft:

- “Restrictions on clearcutting and logging near streams shall be *more stringent* than those set forth in the [Conservation Easement Deed]...” (1995:98, italicized words were deleted in 2017. (2017:98)
- The 1995 Plan expressed a strong bias in favor of winter logging. (1995:99) The 2017 Draft deleted this and substituted: “Summer harvesting will be allowed, if necessary to accomplish silvicultural objectives.” (2017:99)
- The 1995 Plan directed that logging roads “will consume *an absolute minimum* amount of area.” (1995:99, emphasis added) The 2017 Draft reads: “Roads will be properly maintained to *minimize impacts* to water quality and wildlife habitat.” (2017:98, emphasis added) Note: Low Impact Forestry consumes only 7 percent of a logged area. The heavy machinery required for conventional intensive management consumes from 20-29 percent of the logged area.⁸ A commitment to Low Impact Forestry by the NSF would not require weakening restrictions on logging road area.

Emulate Natural Disturbance: The 2017 Plan states: “Timber management... will strive to emulate natural disturbance and vegetative regeneration patterns...” (2017:109, #16) An old growth study found: “The [human-] disturbed landscape had lower connectivity and greater habitat isolation. In short, disturbed landscape had an artificially elevated diversity of successional forest types at the expense of what naturally would be

⁷ Mitch Lansky, “The Double Bottom Line: Managing Maine’s Forests to Increase Carbon Sequestration and Decrease Carbon Emissions,” April 2017, p. 6. <http://www.meepi.org/lif/>, p. 6.

⁸ An important book on Low Impact Forestry is available in the Weeks Memorial Library in Lancaster: Mitch Lansky, ed., *Low-Impact Forestry: Forestry as if the Future Mattered* (Hallowell, ME: Maine Environmental Policy Institute, 2002. Lansky, Double Bottom Line, p. 14-15.

the common matrix, old-growth forest.”⁹ Natural disturbance events will continue to create gaps in forests whether managed or not. Even-aged management does not “mimic” natural disturbance.

Salvage Logging: The 2017 Draft makes several references to “salvage” logging. (2017:16, 94, 100, 113) A study of the 1938 Hurricane, by researchers at the Harvard Forest in Petersham, Massachusetts, concluded ecosystems that are left alone heal much more rapidly than salvaged forests recover.¹⁰ Salvage logging—except to clear roads and other places for reasons of public safety—should be rejected.

A Local Forest-Based Economy: The 1995 Plan was clear in its commitment to growing dramatically older stands to support a high value, high quality sawlog market to produce locally-owned, niche forest products. For the next several decades, the few older stands should be allowed to age and sequester carbon.

In my oral history of the Groveton paper mill, the former mill managers clearly outlined the causes of the mill’s demise (and more generally the decline of northern New England’s paper industry). Most significant were: high energy demand coupled with soaring energy prices; low commodity paper prices and competition from newer faster mills in places with lax (or non-existent) environmental and labor protections and lower wages; and decisions to deny investment, to sell, or to close mills that were made on Wall Street, not Main St., by absentee owners with no commitment to local communities. The lack of regional economic diversity has kept us depressed for a full decade following the mill closures.

To minimize the impacts of global economic forces, we should promote more local ownership of businesses and services that require less energy and are committed to developing a diverse array of niche products that add high value to our natural resources. We must avoid commodity production because we cannot win in that global game that often degrades forests.

The state’s current economic revitalization plan for Coos appears to be in conflict with the economic lessons of the mill. What if the subsidies to absentee developers and absentee-owners of high carbon footprint energy projects, such as the Burgess biomass plant, were re-directed to small-scale, solar energy and to local, lower-impact agriculture, forestry, and recreation and tourism? What if we had ten or twenty outfits that were locally owned, added high value, and operated with a fairly low carbon footprint. The Garland Mill in Lancaster is an example. We should be getting ideas on potential value

⁹ Lapin, *Old Growth Forests*, p. 6

¹⁰ See: Sarah Cooper-Ellis, David R. Foster, Gary Carlton, and Ann Lezberg, 1999, “Forest Response to Catastrophic Wind: Results from an Experimental Hurricane,” *Ecology*, vol. 80, no. 8, p. 2693. David R. Foster, John D. Aber, Jerry M. Melillo, Richard D. Bowden, and Fakhri A. Bazzaz, 1997, “Forest Response to Disturbance and Anthropogenic Stress,” *BioScience*, July/August 1997, vol. 47. no. 7, p. 440.

added uses of poplar and other lower value species from UMO and anywhere else where there are good ideas.

We need some model sites to showcase Low Impact Forestry, and to provide high quality sawlogs for local niche manufacturers. We need land management education programs to showcase ways for optimizing carbon sequestration on all lands. We need school kids touring these model operations in the NSF. And we need more research on ecology, forest management, and climate change. What better place than a 40,000 acre intact watershed owned by the state in the heart of a region that has been depressed for a decade?

Biomass: The 2017 Draft (pages 87-88) offers an upbeat section on biomass—whole tree chipping to feed electricity-generating biomass boilers. Its discussion of carbon sequestration ignores the role of older forests in carbon sequestration. (2017:88) Wood chips are a low-paying commodity, and the huge cost of chipping machines (\$250,000 or more) ensure that biomass cutters will not practice “good long rotation timber management” as the 2017 Draft claims. (2017:87) Heavy cutting releases significant amounts of sequestered carbon from above ground biomass and from soils disturbed during logging.

- Biomass Plants are inefficient, wasting up to 75 percent of the energy of a wood chip. Burgess in Berlin requires about 100 tractor-trailer loads of chips every day. Seventy-five of those loads are effectively wasted by the plant’s inefficiency.
- Biomass plants are neither “green” nor “carbon neutral” as industry sources (quoted by the 2017 Draft, p. 87) allege. Biomass plants, such as Burgess, actually emit more carbon per unit of energy produced than do coal plants!¹¹

The NSF should not permit Whole Tree Harvesting, and any woodchipping should be by-products of low impact stand improvements, not commercial chipping operations.

WILDLIFE MANAGEMENT

The 1995 Plan’s goal for wildlife was “to sustain viable populations of all species occurring naturally in the Nash Stream Forest.” (1995: 64) The 2017 Draft adds: “with a particular emphasis on target species.” (2017:63) The target species are a mix of rare, threatened, or endangered species such as Bicknell’s thrush and Canada lynx, and common game species such as woodcock, ruffed grouse, and white-tailed deer.

¹¹ Mary S. Booth, PhD, *Trees, Trash, and Toxics: □How Biomass Energy Has Become the New Coal*, Partnership for Policy Integrity, April, 2014. <http://www.pfpi.net/wp-content/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf>. Duncan Brack, *Woody Biomass for Power and Heat: Impacts on the Global Climate*, Chatham House, UK, February 2017.

<https://www.chathamhouse.org/sites/files/chathamhouse/publications/research/2017-02-23-woody-biomass-global-climate-brack-final2.pdf>

Naturally-occurring species native to the region evolved in old growth, pre-settlement forests that were shaped by natural disturbance events and naturally-changing climate conditions. Species that are associated with early successional habitat did not go extinct in the pre-settlement forests. Their population numbers may have been lower than in today's younger forests, but their continued survival was not in doubt. Old growth is the optimal habitat for rare native species, from lynx to unstudied, poorly-understood mosses, lichens, fungi, and invertebrates. These species flourish in the complex vertical habitats and the deadwood, cavities, and coarse woody debris, characteristic of old growth. Natural disturbance events provide gaps and sufficient early successional habitats to meet their needs. In addition, there is an excess of early successional habitat from unregulated, intensive logging in the surrounding, privately-owned landscape. Coos County boasts very few old stands, and this is where NSF must make an important contribution.

Climate-Stressed Species Needs: Wildlife species stressed by climate change need unfragmented habitat to allow them to migrate to more suitable climate conditions, and to prevent loss of genetic diversity that occurs when populations are isolated by roads, clearcuts, and other barriers to movement. Loss of genetic diversity reduces the evolutionary adaptability of stressed species. The 1995 Plan directed NSF Managers to "minimize the fragmentation of the Forest" by management activities. (1995:62-D)

Invertebrates in the NSF are unstudied; therefore we cannot know what impacts the double whammy of climate change and even-aged management have on them. Instead of recommending larger preserves, the 2017 Draft proposes increased logging.

The ecological restoration of the Nash Stream by Trout Unlimited, DFL, and Fish and Game is a most positive development. Aquatic ecosystems are among the most highly stressed ecosystems in North America. Climate change exacerbates these stresses. As fresh waters warm due to climate change, dissolved oxygen content declines and cold-water fish, such as salmonids, suffer additional, potentially lethal, stress. Alterations in the timing of important changes, such as spring runoff and ice-in/ice-out, can disrupt the timing of mating, fish migration, predator-prey relationships, and pollination.

Aquatic insects are among the most poorly studied classes of animals. Temperature controls the life development of aquatic insects. Daily, seasonal, and annual changes in temperature affect metabolism, growth rates, size, development, and behavior. Higher temperatures caused by anthropogenic climate change may affect the timing and behavior during reproduction. Short-lived adults such as caddisflies, mayflies, and stoneflies are unlikely to be able to migrate great distances. Their larvae may be able to migrate within streams, and perhaps across land, provided the land to be crossed affords favorable conditions.¹²

¹² Bernard W. Sweeney, John K. Jackson, J. Dennis Newbold, David H. Funk, "Climate Change and the Life Histories and Biogeography of Aquatic Insects in Eastern North America," in Penelope Firth, Stuart G. Fisher, eds. *Global Climate Change and Freshwater Ecosystems* (New York: Springer-Verlag, 1992), pp. 162-165.

NATURAL AREAS

The establishment of Core Natural Areas where no management or high-impact activity is permitted was one of the most important elements of the 1995 Plan. Unfortunately, nearly all of the most productive, lower elevation soils are in the timber management zone, not in reserves. The failure to establish lower elevation Control Areas is a major setback to vital monitoring obligations and an equally significant setback for preserving older, unfragmented, high productivity sites.

Maintain Current Levels of Biodiversity—A Dangerous Precedent: The 2017 Draft offers a new goal: “Maintain current levels of natural community and plant species diversity.” (2017:35) Current levels of biodiversity are a reflection of the current condition of the NSF. Until the Civil War, the NSF sustained species that flourished in all-aged stands, from early successional to old growth. Currently, with few trees older than 100 years, and most of the complex habitats sustained by older age classes missing, maintaining “current levels” of biodiversity means maintaining a young, biologically impoverished forest, not the rich diversity afforded by complex, older habitat.

No Cutting in Natural Areas or Corridors: The 1995 Plan stated: “There will be no physical manipulation of a natural preserve area that would alter natural processes or features.” (1995:117) The new Draft replaces “no physical manipulation” with: “Core natural areas are subject to *the minimum management necessary* to achieve the Vision [of 2017, not 1995].” (2017:33 emphasis added)

The 1995 Plan and the 2017 Draft permit “limited management” in the corridors. (1995:81; 2017:95) Corridors should be managed as core natural areas because their purpose is to connect cores, not buffer them. There should be no management in corridors, and they should be buffered.

Given the threats of climate change, the need for maximal carbon sequestration in the NSF, and the need for high quality habitat for climate-stressed wildlife, the wisest Forest Management Plan would decree that the entire NSF Watershed should serve as a Natural Area and the site of a Long Term Ecological Research Project.

RECREATION

Low Impact Recreation: The 1995 Management Vision stated: “Continue to offer public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas.” (1995:61) It also noted that the NSF has excellent potential for “non-consumptive uses” of wildlife for birdwatchers, photographers, artists, and hikers. (1995:50) Non-consumptive uses impose a lower carbon footprint than motorized and consumptive uses. Old forests, not understocked stands, are the allure for most non-consumptive recreationists.

ATVs: In 2002 the State bowed to pressure from ATV enthusiasts, and the 1995 Management Plan's ban on ATVs was repealed to allow limited ATV use on a trial basis in the NSF.

ATV Trail Expansion: The decision by CORD (Council on Resource Development) in December 2016 to deny a request for an east-west connector across the southern portion of NSF because it was deemed inconsistent with the terms of the 1988 Easement is an important step in limiting the heretofore unrestrained growth of ATV traffic in Coos County. CORD did not rule that future trail expansion requests would also be found inconsistent with the Easement; we can expect additional ATV trail expansion requests.

The state is permitting an expansion of the ATV network to include the Kelsey Notch Trail despite inadequate monitoring. (2017:132, Objective 1)

Public Testimony on ATVs at the February 16 Comment Session in Whitefield: Six of the sixteen speakers supported ATV trail expansion. Seven speakers opposed ATV trail expansion, and the other speakers raised issues about preserving ecosystem health and the NSF's failure to monitor the ecological impacts of ATVs. Several arguments advanced in support of trail expansion require documentation before they can be considered valid. These include:

- *The footprint of ATV trails is only 1.3 percent of the acreage of the NSF.* The noise footprint, as well as the dust and mud footprints, are substantially larger and this must be acknowledged. Without studies and monitoring, this claim is not credible.
- *A bird study found twice as many "birds" on NSF after ATVs arrived.* I could find no such study in an internet search. Unless access to that study is provided so that its methodology and findings can be evaluated, the idea that birds are not impacted by ATVs cannot be entertained. Note: a peer-reviewable study likely would report on numbers of "bird species" not numbers of "birds."
- *Disabled ATV riders:* The Ride the Wilds web site boasts there are more than a thousand miles of ATV trails in Coos County. Surely, this represents adequate riding opportunities for all riders.
- *ATVs have "minimal impacts on nature."* No documentation in the form of studies or monitoring on the NSF was offered to substantiate this claim. Undocumented claims are not sufficient to justify revisions of the 1995 Plan.
- *The importance of the Coos County ATV economy.* It is true that the growth of ATV use in recent years has added to the Coos economy. However, this raises two questions:
 - 1) Has ATV use reached an upper limit? The growing pushback against ATV expansion in NSF and in other towns throughout Coos County suggests that the region has reached or passed the ATV saturation point. This means there is scant room for politically-acceptable expansion (growth) of the ATV economic sector.

- 2) Overreliance on the ATV economic sector renders Coos County vulnerable to the same fate it suffered when paper mill closings exposed the region's lack of economic diversity. We need greater support from Concord in developing locally-owned, low impact, niche products and services that diversify our farm and forestry economy and lower our regional carbon footprint. There is much more potential for growth in the non-motorized recreation sector, and this also would contribute to overall economic diversification.

Inadequate Monitoring of Ecological Impacts of ATVs: The 2017 Draft allows ATV traffic in "designated areas that do not negatively impact traditional uses or conservation values." (2017:20, 130) The necessary ecological monitoring of the impacts of ATV-generated dust and mud on aquatic ecosystems, carbon emissions into the atmosphere, and the impact of noise and high-density use on wildlife has not been performed.

Inadequate Funding for Safety & Enforcement: At the December 14, 2016 NSAC meeting in Lancaster, Will Abbott of the Forest Society testified that the State needs ten additional enforcement officers to deal with current levels of ATV activity. *The State either must diminish ATV trails and traffic, or adequately fund ATV enforcement requirements.*

FUNDING

Funding has not always been available to help the State manage the NSF in an ecologically-sensitive and enlightened manner, as directed by the 1995 Plan:

- Inadequate funding for monitoring;
- Inadequate funding for safety and enforcement of ATV use;
- The NH Legislature does not Fund the NSF Forester position(s). The increased logging called for in the 2017 Draft appears to be intended to pay for the unfunded position(s). This is an unacceptable precedent that that could lead to serious overcutting in the future. It must immediately and permanently be rejected.

RECOMMENDATIONS

1) IMPLEMENT IMMEDIATELY MAJOR DIRECTIVES OF 1995 PLAN, ESPECIALLY:

A) CONTROL AREAS

- 100-200 acres for predominately hardwood control areas;
- 1500 acres for predominately softwood control areas.

B) FOREST INVENTORY

- Establish a regular cycle for the Inventory process.

C) MONITORING

- All monitoring directives from 1995 Plan must be carried out, especially the ecological impacts of timber harvesting and ATVs.

D) PUBLIC REVISION PROCESS

- See Recommendation 11 (below) "Recommendations for the next steps in the revision process."

2) CLIMATE CHANGE

The revised 1995 Plan must address the myriad impacts, threats, opportunities and issues pertaining to anthropogenic climate change. There must be particular emphasis on maximizing carbon sequestration, minimizing carbon release from soils, and minimizing habitat degradation or fragmentation, and the establishment of a NSF Climate Change Advisory Board.

3) FOREST MANAGEMENT: RETAIN 1995 PLAN

Discard the entire 2017 Forest Management revision. Retain the 1995 Forest Management Plan section, especially its directives for older forests with very small openings and reliance upon uneven-aged management. Data not available to the 1995 Plan, for which there is adequate documentation, should be added to the 1995 text.

4) HIGH VALUE-ADDED SAWLOGS, NOT LOW VALUE COMMODITIES

Reinforce the 1995 Plan's commitment to a high value added sawlog economy, not a low value, high risk of forest degradation, wood chips and commodity economy.

5) PROHIBIT WHOLE TREE HARVESTING

Expressly prohibit commercial whole tree harvesting operations in the NSF. Wood chips that are by-products of Low Impact sawlog harvests or of Low Impact Forestry timber stand improvements are permissible.

6) WILDLIFE MANAGEMENT: MANAGE FOR OLDER FORESTS

Withdraw the Wildlife Management chapter. Manage for complex older forest habitats, as directed by the 1995 Plan, not for common game species (as there is abundant early successional habitat in the surrounding privately owned forests). Focus on climate-stressed species & communities, and rare, threatened and endangered species and communities.

7) NATURAL AREAS CHAPTER REVISIONS

- Establish Control Areas (Recommendation 1-A);
- Expand Natural Areas, especially below 2700 foot elevation areas;
- Establish more (and wider) corridors between core natural areas. They shall be managed as cores are managed (no management);
- Work to restore natural populations of native species (not artificially high populations of common game species);
- Special focus on the protection of habitat needs of climate-stressed species.

8) FAVOR LOW IMPACT, NON-MOTORIZED RECREATION

- No ATV Trail expansion;
- Monitor the ecological impacts of ATVs on NSF, or suspend operation of unmonitored, high impact activities such as ATVs (and timber harvesting).

Continued high impact use that is un-monitored is not an option under the Vision of the 1995 Plan.

9) DEVELOP NSF'S POTENTIAL AS A RESEARCH AND EDUCATION RESOURCE

- Transform the NSF into an exemplary State Forest that promotes education, research, and ecological restoration;
- Collaborate with groups such as TU, schools, academic researchers, and other private and public organizations and institutions to achieve this goal;
- Showcase exemplary practices such as Low Impact Forestry and ecological restoration;
- Instruct private landowners in excellent forest management practices, and offer them strategies for dealing with Climate Change including: maximizing carbon sequestration, minimizing carbon releasing disturbances during harvesting, reducing stress on carbon stressed species; and minimizing habitat fragmentation;
- If NSF is managed for 1995 vision and not the 2017 commodity approach, then it is an attractive venue for research, model projects, and creative collaboration. This would expand revenues available to NSF as groups such as Trout Unlimited and academic researchers bring their own funding (cash and in-kind). This could represent a major augmentation of monitoring and inventory budgets.

10) FUNDING PRIORITIES

- Secure adequate funding for monitoring and ATV enforcement, **or suspend** high impact, unmonitored activities.
- If the revised NSF Management Plan retains the 1995 Forest Management section (and discards the 2017 Forest Management revisions), there will be broad public support for Legislative funding of the NSF Forester position. In any event, the health and welfare of the young, recovering forests of NSF cannot be held hostage to failure of the Legislature to properly and adequately fund the budget of DFL.

11) RECOMMENDATIONS FOR THE NEXT STEPS IN THE REVISION PROCESS:

- A) Establish a citizens' committee (preferably a mix of current and 1995 viewpoints, but not tech team members); return the tech team to its proper role. They were enormously important and helpful during the 1995 process.
- B) Use the 1995 Plan as the text to be revised, but immediately adopt the 2017 formatting changes. I know from experience that cutting and pasting the 1995 Plan into the 2017 format could be accomplished in a few hours.
- C) Ask the Tech Team to identify all the proposed revisions they made in the 2017 Draft, and require them to supply documentation of need for changing the 1995 Plan. Many proposed changes will be easy to document and incorporate into a revision, including: updates on things that have happened since 1995; results of monitoring and other data gathering since 1995; reports on TU's restoration project and the Coos Trail.

D) For the currently undocumented revisions, the proposers of change must supply documentation of need for change. Such documentation would ensure the adoption of a proposed revision. Failure to document a need to change would result in a call for more adequate documentation or rejection.

E) Climate Change is the most important topic not addressed by the 1995 Plan (or the 2017 Draft). A subcommittee of the re-revision team should work with forest and climate scientists to identify the most urgent climate change issues and to develop suggestions about how to avoid, adapt, or mitigate potential threats posed by climate change. This material can be woven into the 1995 Plan wherever it is appropriate.

F) Review public comments and explore important issues raised. A speaker at the Whitefield comment session noted that the NSF is a valuable, under-utilized educational resource. Public-private collaboration should be explored. The 2017 Draft speaks rather wistfully about that, but offers no concrete strategy. The revision should offer a more comprehensive strategy for developing partnerships with TU, UNH researchers, and others. TU's restoration work is an excellent role model. Establishing partnerships with UNH and other academic institutions should be very high priority.

G) Weave all these strands together. A group committed to excellence in public land management and protection of ecosystem integrity could complete this work inside of 4-6 months. Except for the climate change sections (and perhaps a few others), they will be working with existing materials and preparing them for the final weaving together process.

It is essential that this re-revision process use the 1995 Plan as the Text. The 1995 Plan remains the operative management document; the 2017 draft has never been adopted. Revision means identifying weaknesses, obsolete sections, and major gaps in the plan, not trying to undo the damage caused by a controversial Draft that jettisoned the spirit of the 1995 Plan and never has been adopted or implemented. This is a profoundly important public lands management precedent that we need to get right. If 2017 is the starting text, it will be far more difficult to reinstate good material from 1995 and excise the undocumented additions inserted into the 2017 Draft. Important, well-documented elements of the 2017 Draft will be incorporated into the revised 1995 Plan.

Thank you for considering the comments submitted by me and other members of the public.

Sincerely,
Jamie Sayen

Guinn, William

From: Bob Baker <abobbaker@aol.com>
Sent: Thursday, March 02, 2017 3:38 PM
To: DRED: Nash Stream Plan
Subject: Comments on Draft Management Plan

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord NH 03301

Dear Mr. Simpkins:

My wife and I have been residents of Columbia, NH for the past decade. We are avid hiker and have had the opportunity to enjoy many miles of trail in the nearby Nash Stream Forest. Following are our comments on the 2017 draft management plan currently under review and discussion:

1. There should be no ATV uses permitted whatsoever. The original plan got it right and the draft should revert to the absolute ban on ATVs. Private landowners around us have permitted ATV uses on their property and we do not object. Private landowners have rights to share their property with even nuisance users. But the Nash Stream Forest is a place that belongs to all of the people of NH and many of us find the noise and pollution of ATVs to be highly objectionable. The damage that they do to underlying root structures and fragile flora is completely unnecessary. The industry itself has plenty of spaces to use. The ATVs have successfully cobbled together literally thousands of miles of trail in northern Coos County alone. But for the ATV industry and users, enough is never enough. Hikers, hunters, fishermen, and campers also have rights to enjoy the wilderness in quieter pursuit of their hobbies. There must be places left untouched by the racket, pollution and damage potential of reciprocating engines and spinning treaded tires. Please remove all ATV uses from the peoples' forest!

2. Where does the draft plan take into account the tremendous threat of global warming? There is no evidence that the original plan's requirements for setting aside control areas have been honored. Why isn't the State of NH complying with this? What a wonderful but apparently lost opportunity to begin the process of establishing large stands of undisturbed old growth forest so we can better understand the impact of global warming and the changing make up of our forest plant and animal species. How can a proper 21st Century Management Plan totally omit this subject and concentrate on preventing the eventual recovery by cutting the still very young NSF forests to feed the maws of inefficient biomass power plants such as Burgess that pollute our air? God how we need to preserve the lungs of the planet instead of burning the carbon sequestered by our forests! No mention is made of this goal or concern. Again—it is the peoples' forest! It is not being managed by the State for the sake of the logging industry alone. Preservation must be put on a level playing field with exploitation. The draft plan should at least set aside large tracts for long term preservation. I want my grandchildren to be able to walk in and enjoy much older forest than the current young forest stands in Nash Stream. Nash Stream must accomplish this for the sake of our offspring!

Thank you for your attention to our comments. We hope that the final plan will accommodate these concerns and requests.

Very truly yours,

Alan Robert Baker
Attorney at Law
481 Meriden Hill Rd.
North Stratford NH 03590
Tel. 603-922-5571
Cell 860-836-6094
Email: abobbaker@aol.com

Guinn, William

From: Bond, Michele <Michele.Bond@asrcfederal.com>
Sent: Thursday, March 02, 2017 3:45 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream ATV Oppose
Attachments: Save Nash Stream.pdf

Dear Director Simpkins –

I wanted you to know that I love spending time, which we do every year, at Lake Christine and the surrounding area. I grew up in rural PA in an area that is similar to Stark and Lancaster NH; it was and is rural, sparsely populated, and economically challenged. But, it is also beautiful, serene, and an enclave from noise and hustle and bustle. I hope that you will strive to keep the area around Lake Christine as it is – quiet, bucolic, an oasis. Attached please find my letter opposing expansion of ATV trails in the Nash Stream State Forest. I hope that you will thoughtfully consider my input and perspective in your decision process.

Thank you

Michele Bond
Senior Vice President, ASRC Federal Health
w: 703-478-2650 | m: 301-467-2458 | Michele.Bond@asrcfederal.com
11091 Sunset Hills Rd #600, Reston, VA 20190
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1 March 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

I grew up in rural central Pennsylvania, in coal mining country. With the exception of the mountains, it is not dissimilar to Coos County – even today. We share the same economic and social challenges. Growing up, we hiked, we played in the woods, we fished, we hunted. These same traditions are passed on to the next generations, along with an appreciation and respect for the land. But, we also have ATVs and other off road vehicles. The silence and tranquility are gone.

For the past 12 years, I have been visiting Lake Christine and the surrounding area with my family. Not only is it unspoiled and beautiful, it reminds me of home...but, as it used to be. No noise. No engines. Only silence...or even better, loons and wildlife.

In my home, ATVs are granted access to private lands, with understood “rules of the road” and a code of conduct. So, it is arguable that if access for ATVs can be created in rural Pennsylvania on private lands, there is no reason to jeopardize irreplaceable publicly managed land in New Hampshire. There are alternatives. Access, and the potential economic benefit accruing from it, can be created. It’s just harder, however, than simply acquiescing and un-doing generations of environmental preservation – both private and public (long before the concept was even coined) - of the Nash Stream Forest.

I encourage you to find other ways to satisfy the need to increase ATV access, without despoiling the Nash Stream Forest. I commend to you the following from the West Point Cadet Prayer, as you deliberate such an irreversible step: “Make us to choose the harder right, instead of the easier wrong”.

Please save Nash Stream Forest from what ATVs have done to my home.

Respectfully,

A handwritten signature in black ink, appearing to read 'M Bond', written in a cursive style.

Michele Lynn Phillips Bond
Lilly, Pennsylvania

Guinn, William

From: ben@garlandmill.com
Sent: Thursday, March 02, 2017 5:01 PM
To: DRED: Nash Stream Plan
Subject: re: NO

To Whom it Concerns

I'm a lifelong resident of Lancaster NH. I've been going to the Nash Stream area my whole life to hike, fish, ski and swim in the stream and paddle in the ponds. I enjoy the quiet beautiful nature out there. I'm angry that the state has allowed ATV trails to be built in this quiet natural environment and I definitely oppose new trails being made. Period. I would like the state to remove the existing trails immediately.

ATVs are loud, they pollute the air with toxic exhaust and the air waves with loud noise. So much of our environment is already polluted this way. The Nash Stream Forest should be keep free of this pollution.

Thank you for your consideration.

Ben

Ben Southworth
Garland Mill Timberframes
273 Garland Road
Lancaster, New Hampshire
03584
www.garlandmill.com
p/f 603 788 2619
cell 603 631 0164

Guinn, William

From: C R <racetelemark@hotmail.com>
Sent: Thursday, March 02, 2017 5:40 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan and ATVs

Dear Folks,

Do not promote ATV use within the Nash Stream Forest.

ATV's are a heavy "use" upon public multi-use lands. They don't mix well with other users. They may be very loud, fast, erosive to the trails they ride, and a broad disturbance to wildlife, as well as non-motorized multi-use users. Their place upon public lands should be limited to few trails as they do not share the land well with other non-motorized land users, and ATV's stress wildlife.

Non-motorized users have difficulty and danger sharing the use areas with ATV's. It is similar to the rationale as to why we have sidewalks next to streets. Fast motorized vehicles do not share the same space with pedestrian and cyclists, as well as animals. ATV's stress the wildlife, and similarly, ATV's often stress non-motorized appreciators of nature such as the Nash Stream Forest.

ATV's noise carries far. Their noise and speed and erosion sets them apart from non-motorized users who can share the lands without disturbing other users with noise and the dangers of motorized speed.

"The Nash Stream Forest was purchased by the state through the Land Conservation Investment Program (LCIP) to preserve the property's natural beauty, landscape, rural character, natural resources, and the quality of life in New Hampshire,.." - from The Nash Stream Plan

ATV's actually damage and detract from "the property's natural beauty, landscape, rural character, natural resources" in general, and for most all others.

- Chris Rice

NH, Coos County resident and outdoorsman.

Guinn, William

From: markroberts <markroberts435@gmail.com>
Sent: Thursday, March 02, 2017 8:41 PM
To: DRED: Nash Stream Plan
Subject: 2017 Draft Revision of the 1995 Nash Stream Management Plan

Dear Sir/Madam,

I am writing in opposition to the 2017 Revision of the 1995 Nash Stream Management Plan. My objections are as follows:

1. The Revision ignores and neglects the role that old growth forests play in climate change buffering through high volume carbon sequestration. It reverts to an unscientific and climate- hostile model of profit driven wood product extraction.
 2. The Revision flies in the face of the 1995 Plan's recommendations on how to conduct a fair and balanced review and revision. The authors of the 2017 Revision will be the agents empowered to implement it. Talk about conflict of interest! The 1995 was written by a committee of individuals from a range of interests and backgrounds. The DFL and Fish and Game contributed input but were not the main authors of the plan.
 3. The 1995 plan discouraged even-aged management and clear cutting. The new plan reverses this, and calls for heavier cutting.
- .. The DFL has failed to set up control areas for more than 20 years after being told to in the Plan. There is no accurate monitoring of the ecological impacts of timber harvesting. Timber harvesting should be suspended indefinitely until control areas have been established and protected.

The 2017 draft is bad forest policy. I urge you to scrap it and begin over on a draft that will respect the spirit and substance of the 1995 NSM document.

Mark Roberts
2171 Pearl Lake Rd.
Lisbon, NH 03585

Guinn, William

From: Larry Gomes <feedback@nashstreamforest.com>
Sent: Thursday, March 02, 2017 8:51 PM
To: DRED: Nash Stream Plan
Subject: Fwd: Nash stream OHRV trails

----- Forwarded Message -----

Subject: Nash stream OHRV trails
Date: Thu, 2 Mar 2017 13:25:39 -0500
From: Kevin Graham <keving@yhm.net>
To: nashstreamplan@dred.nh.gov
CC: feedback@nashstreamforest.com

Good afternoon,

I'm writing in regards to the proposed changes and possible closure of the Nash Stream Forest OHRV trails. I feel that closing the existing trail system would be very detrimental to the local economy and bordering communities who rely on the revenue generated by OHRV enthusiasts. As a resident of Pittsburg and a fellow OHRV rider and Snowmobiler I know that many families are supported by the income generated by the Off road community. I feel that the OHRV trails and Off road community should be embraced as the trail system is still relatively new and the full potential of the benefits for the local communities have yet to be seen.

I personally embrace the idea of creating new trails for OHRV enthusiasts and families to come and enjoy the great state of New Hampshire and help the community thrive. Much of the reason I relocated to Northern New Hampshire is due to the OHRV trails that are available and allow many towns and communities to be interconnected via an amazing trail system.

Thank you for your consideration.

-Kevin Graham

Guinn, William

From: Cindy Coulombe <cscoul@hotmail.com>
Sent: Thursday, March 02, 2017 10:09 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream changes

Good day Director Simpkins,

I am writing to you to urge the board to go back to conservative use in the Nash Stream area. An increase in allowed timber cutting would be a mistake in such an unspoiled area. There are fewer acres all the time that are unchanged. Climate changes and loss of wildlife are already affecting this area. It is not as bad as some areas, but my family and I hope that Nash Stream keeps a balanced use. Good use would also mean limiting the use of ATV traffic to what it currently is. No increase seems really necessary. If every acre of the North country were available for that type of traffic it would become commonplace, taken for granted, and destruction of the environment would follow. Government budgets can not be depended upon to grant money every year to rebuild roads and trails.

It would be nice to have the control areas ready for study of ecological impact. We know that the studies might not be done soon. The apparent dwindling of wildlife is a big concern. Keeping the trails and roads as they are currently being used would put low stress on people and the environment. Thank you for your time and service.

Sincerely,
Mr and Mrs Ray and Cindy Coulombe

Guinn, William

From: Thomas D. Casey <thomasdcasey@gmail.com>
Sent: Thursday, March 02, 2017 11:21 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Plan
Attachments: Nash Stream Forest Plan Letter.pdf

Please see the attached letter opposing increased ATV access to Nash Stream Forest.

4944 Bradley Boulevard
Bethesda, Maryland 20815
ThomasDCasey@Gmail.com

March 1, 2017

Brad Simpkins
Director
New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands
172 Pembroke Road
Concord, New Hampshire 03301

Attention: Nash Stream Forest Plan

Dear Mr. Simpkins:

A recent story in the Union Leader/Berlin Daily Sun about expanding use of ATVs or OHRVs in Nash Stream Forest alerted me to the necessity to write you to add my voice opposing the request from ATV enthusiasts.

My first visit to the Nash Stream area was a hike up the Percy Peaks in the summer of 1969. My most recent visit was a repeat of that hike last summer. In the years between, I have spent all or part of seventeen summers in New Hampshire and in Coos County with particular delight.

Although not a New Hampshire resident I am most assuredly a stakeholder and taxpayer – and intend to remain one.

The Coos Trail, Christine Lake, and Nash Stream areas are extraordinary resources in the northeastern United States and absolute gems within the Granite State. I cannot think of any spot in the WMNF that offers an equal combination of wild-ness, quiet, and natural beauty. You and your Division know this well, I am certain.

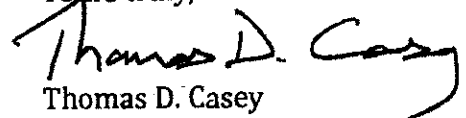
The Nash Stream Forest as managed now is an asset that cannot be replicated. From news reports and talking to Coos County residents over the years, I understand the State assembled these protected areas and safeguard them with considerable cooperation from private landowners who believe the 1995 Nash Stream Forest plan restrictions on motorized recreation should be honored.

Expanding ATV/OHRV access to areas already are designated for that purpose makes sense. An affirmative choice to bring more noise, more exhaust fumes, more oil and fuel spills, more danger, and more conflict between hikers and ATVs to such a wild and quiet forest make no sense.

Since the 1995 plan was put in place, ATV/OHRV use and state cooperation with motorized recreation has increased substantially. But no more areas like Nash Stream, Coos Trail, and Christine Lake have been created.

I ask the State of New Hampshire to deny expanded ATV/OHRV access to Nash Stream State Forest, find ways to accommodate motorized recreation in areas already dedicated to that activity, and to prioritize irreplaceable natural assets over a pastime that will wax and wane with fuel prices and the next "cool" thing.

Yours truly,


Thomas D. Casey

Guinn, William

From: Paul Doscher <padoscher@comcast.net>
Sent: Friday, March 03, 2017 3:25 AM
To: DRED: Nash Stream Plan
Cc: mmccubrey@tdsprinting.com; tom Ives; Keith Curley
Subject: Comments from Trout Unlimited NH Council
Attachments: Trout Unlimited – NH State Council.docx; ATT00001.txt

The NH Council of Trout Unlimited is grateful for the opportunity to comment on the proposed Nash Stream Management Plan in the attached document.

Trout Unlimited – NH State Council
c/o Paul Doscher, Secretary
274 Poor Farm Road
Weare, NH 03281

March 3, 2017

Commissioner Jeff Rose
Department of Resources and Economic Development
172 Pembroke Road
Concord, NH 03301

RE: Comments on Nash Stream Management Plan

Dear Commissioner Rose,

I am submitting these comments on the new Nash Stream Management Plan on behalf of the New Hampshire Council of Trout Unlimited, which represents all the local chapters of TU in New Hampshire. As you may recall, I personally served on the Nash Stream Advisory Committee for a number of years, and also serve on the national Board of Trustees of TU.

TU has been actively involved for the past 10 years in the restoration of Nash Stream and its tributaries in the Forest. A collaboration among TU, NH Fish and Game, and DRED has resulted in more than \$1.5 million invested in the restoration of a fishery that was severely damaged after a dam failure and stream alterations by a previous owner in the 1960s and 70s. This major habitat restoration project is slated to continue in 2017, investing another \$58,000 to bring the project to a completion. The following is an excerpt from a recently prepared proposal to local TU chapters to support this funding in 2017 (emphasis is added):

“The Project recently was named to the National Fish Habitat Partnership’s list of “Waters to Watch,” and is one of the largest river restoration efforts ever undertaken in the Northeast. A significant amount of work has been accomplished since project inception in 2005. Nine culverts were replaced with natural-bottom structures that span the bankfull channel. Three culverts were removed, and the roads decommissioned. This work reconnected tens of miles of previously inaccessible habitat for native fish species and other aquatic organisms. Over seven miles of mainstem habitat were restored, and wood replenishment was implemented on five high priority tributaries. Fish survey data indicates that work in the mainstem and tributaries is having a dramatic and beneficial effect on the native fish community; both fish abundance and age class diversity is greater in proximity to restored areas. Reaches where instream wood was restored have six times the number and seven times the biomass of adult trout as reaches with no wood additions.

However, some critically important work is unfinished and must be completed to close out this watershed scale project. This includes finalizing restoration of the lower mainstem of Nash Stream between Long Mountain Brook and West Side Road. The design for the remaining 0.7-mile segment is complete, and the necessary permit is in

hand. Work will be performed by a local contractor and involve pool construction, floodplain reconnection, and installation of numerous structures including boulder-wood clusters, sloping log sills, rock weirs, constructed logjams, and flow deflectors. The goal is to restore natural channel processes and improve instream habitat in reaches severely degraded by the dam break in May 1969 and subsequent channel alteration.

In addition, instream wood will be restored in approximately 3.6 miles of perennial tributary habitat by strategic felling and using manual cable hoists to properly place the wood; this permit also is in hand. The Student Conservation Association will perform the work. The purpose is to simulate natural recruitment of wood to the stream with the goal of creating pools and habitat diversity, and retaining sediment and organic matter in the system. The cable hoist is a hand-operated, ratchet puller which uses wire rope for heavy-duty work such as moving trees and boulders. Strategic felling is a technique where an experienced sawyer fells selected trees close to the stream so that the majority of the trunk or crown spans the channel; care is taken to avoid creating large holes in the tree canopy. The tributaries where wood will be replenished are East Branch and Long Mountain Brook.

Restoration activities will commence in June 2017. All work will be implemented under the direction of River Solutions LLC using proven restoration techniques that foster natural stream processes and morphology. Great care will be taken to ensure that all wood used for mainstem structures or tributary strategic wood additions is sufficiently ballasted or entangled to maximize ecological benefit, and minimize unintended transport during high flow. The exception is the placement of "self-stabilizing wood" (SSW) in the Nash Stream mainstem. SSW are unanchored whole trees (including rootwads) that mimic the natural recruitment, transport and accumulation of wood within river systems. SSW are used to restore target reaches that otherwise are inaccessible by heavy machinery due to remoteness, steep terrain or extensive wetlands. Published research from Nash Stream has shown that most SSW move only once before lodging in stable positions at log jams or other predictable retention points.

Construction activities for the entire Project will conclude by December 2017. TU and its partners subsequently plan to implement up to ten years of post-construction monitoring to evaluate the results of the restoration work, and to guide similar efforts elsewhere in the Northeast."

TU believes that the Nash Stream Restoration Project is one of national significance. Not only has a significant amount of funding and effort been invested into the improvement of the stream, but to the road infrastructure of the Forest. As one of the largest stream restoration projects in the Northeast, it presents substantial opportunities to learn more about the longer-term results of such efforts through ongoing monitoring. This investment in both restoration and restoration science should be carefully protected.

Because of the importance of this project, TU is concerned that the new Nash Stream plan will expand the use of ATVs on the property, especially on the West Side Road which runs parallel to Nash Stream and in some areas is within a hundred feet of the stream. The road is already open to ATV use, but the creation of a new East West link through the Forest poses the potential to dramatically increase ATV traffic and the risks to waterways from

erosion and siltation. Some anglers also express the sentiment that increased ATV traffic will erode the quality of the fishing experience on what has the potential to become a premier wild trout fishery.

We have learned from the ATV trail expansion at the Connecticut Lakes Headwaters that while the use of ATVs may not always create user conflicts if managed properly, there is the potential for impacts on water quality. The owner of the CT Lakes Headwaters Forest reports that one impact of increased ATV use is the generation of more fine material separation from the road surface, and this material is much more subject to erosion. Should the West Side Road experience substantially greater ATV traffic than present, steps must actively be taken to ensure that this material does not find its way into Nash Stream and its tributaries. Such fine sediment is especially detrimental to fish habitat, as it fills pools and can smother spawning areas.

Another concern is that the plan does not establish sufficient riparian buffers along Nash Stream and its tributaries. Our expert staff of biologists and stream restoration experts suggest there should be a 100' "no cut" buffer along the streams to ensure both water quality, keep temperatures at levels optimal for trout, and allow large trees to grow and become future instream wood. It should be noted that such "no cut" buffers should allow for trees to be cut for the purpose of appropriate habitat management, including cutting for placement of logs in the stream.

Finally, we believe that one of the most significant opportunities presented by the restoration of Nash Stream is the eventual creation of a premier 'destination fishery' of native/wild Eastern Brook Trout that can be self-sustaining without stocking if managed appropriately. This would further enhance the attraction of the area to anglers from throughout the Northeast, who already know that the Upper Connecticut River area is among the best coldwater fishing destinations in the region. We urge DRED, the Division of Forest and Lands and NH Fish and Game to continue to collaborate toward a realization of this vision, and ensure that other uses of the Forest are compatible with it.

Sincerely,

Paul A. Doscher, Secretary, NH TU Council

Cc: Tom Ives, NH TU Council Chair

..... March McCubrey, NH TU National Leadership Council Representative

.... Keith Curley, TU Vice President for Eastern Conservation

Guinn, William

From: Tom Southworth <trsworth@gmail.com>
Sent: Friday, March 03, 2017 7:13 AM
To: DRED: Nash Stream Plan
Subject: Off road vehicle use

To whom it may concern,

Sharing hiking trails with motorized vehicles and the trailer parking lots required for getting them delivered to our wilderness areas is incompatible with my need for solitude while in the forest.

Be in no doubt that after 43 years of hiking and biking in the Nash Stream area I will cease going there if it becomes a popular destination for ATV's.

A sad loss.

Respectfully,

Tom Southworth,

Lancaster. March 3, 2017

Guinn, William

From: David Evankow <devankow@myfairpoint.net>
Sent: Friday, March 03, 2017 7:48 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream 2017 proposed Management plan

To Whom it may concern regarding Nash stream Management plan..

I would like the new plan to be more like the 1995 plan for the forest where it is run as a model of ecologically based forestry I would like to see no new ATV trails in The Nash stream forest. I would prefer that current ATV/ ohrv trails be omitted in time. This hobby has no place in a future built on sustainability.

I would like the forest used for the offsetting of climate change.

Current camps can and should be allowed with no future expansion.

David Evankow
Gorham, NH

Guinn, William

From: Tyler Ray <tray@coopercargillchant.com>
Sent: Friday, March 03, 2017 9:26 AM
To: DRED: Nash Stream Plan
Cc: Tyler Ray; Granite Backcountry Alliance
Subject: Nash Stream Forest: Management Plan Comments
Attachments: Nash Stream - TTR Letter to NHDFL 2017 03 03.pdf


Greetings,

On behalf of Granite Backcountry Alliance, I am submitting comments related to the Nash Stream Forest Management Plan revision to (i) expressly include "backcountry skiing" in its new management plan as a bona fide recreational activity and (ii) to request pilot project consideration in the next two (2) to five (5) years.

Please let me know if you have any questions related to this matter.

Thank you,

Tyler

 <p>COOPER CARGILL CHANT <small>ATTORNEYS AT LAW</small></p>	<p>Tyler T. Ray, Esq. Cooper Cargill Chant, P.A. 2935 White Mountain Highway North Conway, NH 03860-5210 Phone: 603-356-5439 Fax: 603-356-7975 tray@coopercargillchant.com www.coopercargillchant.com</p>
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March 3, 2017

Brad Simpkins, Director
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Management Plan Revision Comments

Dear Mr. Simpkins,

Granite Backcountry Alliance (“GBA”) is a New Hampshire non-profit entity formed to represent the interests of backcountry skiers and snowboarders. This winter time recreational user group of skiers and riders seek remote locations to ski natural features and mountain peaks which provide great recreational value. GBA’s mission is to expand backcountry skiing opportunities for its user base on state property here in New Hampshire. GBA respectfully submits comments here as a means to introduce this mainstream sport into the Nash Stream Forest Plan Revision with the stated goal of proposing pilot project initiatives for glade (or tree) skiing to accommodate a rapidly growing user base and strong demand for skiable terrain in Nash Stream Forest.

Specifically, GBA requests inclusion of a backcountry skiing pilot project in the next two (2) to five (5) years in Nash Stream Forest, well in advance of the next ten (10) year plan revision cycle. As such, GBA respectfully requests that such language be inserted in the Plan’s revision to validate backcountry skiing as a bona fide recreational use and to accommodate and/or facilitate the development of gladed ski trails which shall be consistent with management goals of the Forest including compliance with environmental assessment.

I. GLADE SKIING

Glade skiing is best described as alpine skiing through trees off-trail or on a defined or dispersed woods trail. Glade skiing is developed by “thinning” or “limbing” existing trees in an “area” or “zone” such that the sapling or seedling-type trees are removed and skiers can fluidly navigate through the trees leaving the canopy undisturbed. GBA incorporates forestry thinning practices consistent with the U.S. Forest Service.



II. GLADE SKIING IN NEW HAMPSHIRE

Currently, GBA has developed glade skiing initiatives in New Hampshire towns including Conway, Gorham, and Randolph, and now look to Lancaster, Gilford, Temple and Effingham (among others) to enhance the glade skiing offerings on state property. GBA also works directly with the White Mountain National Forest, municipalities, private landowners, and land trusts, to create a variety of options. GBA feels it is paramount to include the sport of backcountry skiing as an expressly authorized recreational use in the Forest and one which is part of the recreational goals of Forest Management with potential for expansion and improvement of existing terrain.

III. GLADE SKIING IN NASH STREAM FOREST

The low-impact, sustainable, and non-motorized nature of glade skiing lends itself to the management goals of the Nash Stream Forest. Nash Stream Forest is frequently visited by backcountry skiers, most notably the tree-less Percy peaks and Sugarloaf, two backcountry skiing gems. Below tree line, there are substantial opportunities for thinning the Forest of understory and saplings that are currently too abundant to leisurely ski through the trees without interruption.

For example, South Percy, a treeless summit, has excellent summit skiing. However, whichever aspect the skier descends, inevitably the skier will confront thickened bush or saplings to the extent that the skier cannot safely descend. If approved, GBA would come to Nash Stream with an experienced volunteer group and professional trail designer to strategically design a ski glade to ski with certain parameters and scope of project discussed in advance with State officials. With volunteer effort, the saplings would be removed utilizing tactics, specifications and tools/skills as those required in the White Mountain National Forest. With light clearing of underbrush and limbs, a line of sight through the trees enables skiers to conquer the run and truly enjoy the wilderness experience of Nash Stream Forest.

As such, GBA proposes in its comments not only the inclusion of backcountry skiing as an expressly authorized use in the Forest but also to propose pilot project initiatives to allow for skiers and riders to maximize the recreational potential of Nash Stream Forest in a way that aligns with the Forest's stated low impact management goals.

IV. NASH STREAM FOREST MANAGEMENT PLAN 2017 (DRAFT) – GBA COMMENTS

- a. **Article 1, Section 1.1 “Introduction”** is proposed to be changed to read:



"The Nash Stream Forest is also used for recreational activities, including fishing, hunting, hiking, and limited ATV riding in the summer and fall, and snowmobiling, **backcountry skiing**, cross country skiing, dog sledding, and snowshoeing." (italics added)

- b. **Article 1, Section 1.4.2 "Uses Not Allowed by the terms of the Conservation Easement"** is proposed to be changed to read:

"**Public Recreation** – Campsites, trails, (including *backcountry skiing*, cross country ski and snowmobile), picnic areas, boat launches, trailhead parking areas, visitors center and ranger station." (italics added)

- c. **Article 2, Section "Management Vision"**, is proposed to be changed to read:

"**Continue to offer public access** for traditional, low-impact, dispersed recreation including *backcountry skiing*, hunting, fishing, hiking, and snowmobiling in designated areas." (italics added)

- d. **Article 10, Section 10.2.5 "Other Uses"** (paragraph two, second sentence) is proposed to be changed to read:

"There are no trails that are designated specifically for cross country or *backcountry skiing*, although much of the existing winter trail system is suitable for this use, including *dispersed trails, and treeless summits*." (Italics added)

- e. **Article 10, Section 10.3 "Recreation Management Goals"** is proposed to be changed to read:

"Goal: Provide public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking, snowmobiling and *backcountry skiing* that is consistent with the conservation goals for which the property was purchased." (Italics added)

- f. **Article 10, Section 10.3.5 "Other Uses"** is proposed to be added to read:



Objectives

Backcountry skiing opportunities on the high elevations of Percy Peaks and Sugarloaf, and the potential for glading opportunities at and below tree line in those general areas.

Strategies

Backcountry skiing user group representation (Granite Backcountry Alliance) may identify and propose to NH Division of Forests and Lands and/or DRED potential areas of development towards increased access to skiable terrain and a pilot project within two (2) to (5) years for glade (or tree) skiing projects within the Forest to accommodate a rapidly growing user base and high user demand. Proposal shall include specific nature of thinning including aspect, elevation, scope, perimeter, acreage and anything else DRED may reasonably require.

Implementation

Develop glade skiing in specific locations (including select aspect and elevation) through volunteer work. Monitor use allowed and assess its impact on habitat through existing resources.

We very much appreciate your review and consideration toward providing express authorization of backcountry skiing in the Forest and the development and possible implementation of a glade skiing pilot project. We are very excited about our future and look forward to partnering with NH Division of Forests and Lands and DRED in the future.

Please do not hesitate to contact me if you have any questions.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Tyler T. Ray", with a stylized flourish at the end.

Tyler T. Ray
Granite Chief

CC:

Cooper Cargill Chant, P.A. (via email)

Guinn, William

From: Stephen Blackmer <sdblackmer@gmail.com>
Sent: Friday, March 03, 2017 9:58 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream comments
Attachments: Blackmer comments, Nash Stream, March 3, 2017.pdf

Dear friends,

Please find attached my comments on the draft 2017 Nash Stream management plan. Thank you for your consideration.

Stephen Blackmer
603-731-5013

Rev. Stephen Blackmer
107 Hackleboro Road, Canterbury NH 03224
sdblackmer@gmail.com 603-731-5013

March 3, 2017

Brad Simpkins, Director
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Re: Draft 2017 Nash Stream Management Plan

Dear Brad,

Thank you for the opportunity to comment on the draft 2017 Nash Stream management plan.

Summary I am gravely disappointed that the State of NH appears ready to weaken, water down, and piss away the vision that I, and so many others, sweated and fought for.

You can do better than this — and I believe you will.

Introduction & Qualifications By way of background, I am a forester with over 30 years of ecological, conservation policy, and rural economic development experience in New Hampshire. I served as policy director of the Society for the Protection of NH Forests, as conservation programs director of the Appalachian Mountain Club, and as founder and president of the Northern Forest Center. I now serve as priest and chaplain at Church of the Woods, in Canterbury.

In the late 1980s, I was deeply involved in the original negotiations to purchase Nash Stream, working with DRED, The Nature Conservancy, the White Mountain National Forest, NH House and Senate leadership, the Governor, and our Congressional Delegation to protect this forest gem.

I worked closely with USDA and State of NH legal and policy staff to draft the acquisition structure and easement. I fought with Congressional committees and national environmental organizations who believed the land should become part of the WMNF, persuading them that this joint ownership was a visionary means for the federal government to cooperate with states to conserve more forest land. The Forest Legacy program grew from the Nash Stream model, thanks to the pioneering work we did with Nash Stream.

I fought vigorously to ensure the State of NH would be the fee owner and would have the lead role in managing the land. In the face of national opposition, I argued that the State of NH could

develop, uphold, and implement a visionary plan for ecological management of Nash Stream. Notwithstanding the 2017 draft plan, I still believe that.

When the land was acquired, Gov. Gregg asked me to chair the Citizens Advisory Committee to develop a vision for management of the Nash Stream Forest and to support agency staff in developing a detailed management plan. I was chair throughout the development of the 1995 plan, including when passions for this forest grew so hot that the State Police were on call. I was the peacemaker who resolved that incident without police intervention — so we could continue working together to make the best Vision and management plan we possibly could.

Both citizen volunteers and agency staff worked our butts off to make it the best possible plan with the widest public involvement we possibly could have. We were — and are — damned proud of it.

Now, I am gravely disappointed that the State of NH appears ready to weaken, water down, and piss away the vision that I, and so many others, sweated and fought for.

It never occurred to me that, after working so hard to protect this land and enable the State of NH to own it, that I would have to get involved again because NH Forests and Lands & DRED seeks to stray from the vision.

You can do better than this — and I believe you will.

A Vision The heart of the Nash Stream management plan is the Vision — the dream we hold of what this land can be, as a crown jewel of State of NH forests.

What is a vision? It is a timeless expression of what we aspire to. It says, “these are our values, the dream we seek and will strive for.” It tells the world — and ourselves, “this is what we hope and work for. This is who we most truly are.” For example, our nation’s Declaration of Independence states,

“We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness....”

People fight about such statements because what they say really matters. Do we ever actually achieve such a vision? No, because we are human beings we always fall short. But having such a vision enables us to keep trying, to hold steady to what we believe most deeply, to refer back when we are in doubt.

The Management Vision serves that role for the Nash Stream Forest. The changes you propose, however, undermine it such that it would hold little value as a true guiding document.

I ask you to consider these changes proposed in the draft plan.

1. Introductory sentence: "...a model of environmentally sound public land stewardship..." What is the model you envision, now? In the 1995 plan, it is clear what that model is. In the 2017 plan, it is fuzzy and vague — the clarity of focus and intention is gone. Think really hard about how your work can build upon, enhance, and reinforce the vision of Nash Stream as a model.

2. Compare: "Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes. Use and build upon, rather than work in opposition to, ecological principles and natural tendencies. Manage the land *with as little interference as possible* with natural ecological functions." (1995)

with "... Manage the land *in concert* with..." (2017 change)

This small change in words changes the tone entire of the document.

Imagine if the Declaration of Independence said, "all white men are created equal," — which indeed many of the founders assumed it meant. Who would we be as a nation now if that one little word had been added?

Words matter, especially in a constitutional document — a Vision — that sets forth ideals.

The tiny change from "as little interference as possible" to "in concert with" changes everything. "In concert with" is not a vision but — for better or worse — a statement of ecological fact. No matter what actions we take, the ecosystem will respond. And vice-versa. The concert could be beautiful, harmonious, and uplifting, or it could be jarring, painful, and ugly. Either way, human management and the ecosystem will be interact and be "in concert."

If you do not seek to manage with as little interference as possible, how much interference do you envision?

With this change, the vision vanishes.

Please, restore the 1995 clear, compelling statement of intent that this first element of the 1995 vision contains. It's there for a reason — and it's damned good.

3. Compare "Continue to offer public access for traditional, low-impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas." (1995)

with “Continue to offer ATV and UTV use in designated areas that do not negatively impact traditional uses or conservation values.” (2017 addition)

This latter statement does not belong here. The 1995 statement lays out a vision of what kinds of human recreation are in keeping with the overall management of Nash Stream Forest. The 2017 proposed addition is a rationalization.

Language such as “not negative” does not belong in a vision.

Imagine if the Declaration of Independence had said, “We hold these truths to be self-evident, that all men are created equal as long as that does not negatively impact the existing rights of white male property owners.” Again, many of the founders probably assumed it did mean that. Would that make it an appropriate pronouncement of the national dream? Wars are fought over such words.

Take that language and whole sentence out. It degrades the entire Vision.

ATV’s always impact conservation values because they rip up the soil. This, of course, is why so many landowners don’t allow them. ATV use directly conflicts with the first principle of recreational use — that it is “low-impact.” Further, this is in conflict with the management principle of “all management activities will strive to minimize the forest fragmentation.”

The point of speaking about recreation in the vision is that it sets a tone and standard. In the 1995 Vision, we said in effect, “this kind of recreation is what Nash Stream is what makes Nash Stream special — let’s keep it that way.” The Vision is reinforced by the 1995 management principle that “Recreation management will feature the natural beauty of Nash Stream Forest and fit naturally, with minimal development, on the landscape.”

For heaven’s sake, don’t add ATV use to the Nash Stream Constitution. If you must keep the existing trails, then treat them as an aberration. Don’t add any new ones, and don’t give ATV’s “constitutional” status.

The change in 2017 management principle E to allow “a broad range of opportunities” of recreational uses opens doors wide enough to drive a 30 foot RV through. Stay focused on the original vision of “traditional, low-impact, dispersed recreation.” You’ve got a really good thing going in Nash Stream. The first rule of intelligent tinkering is, to paraphrase Aldo Leopold, don’t screw it up.

4. “Water quality protection...” Restore the full language of the 1995 management principle G. Come on, just do it. The restoration of Nash Stream is a great success, thanks to an enormous amount of work and money by a lot of folks. Keep the language that guided and encouraged that work and investment.

5. The 1995 Vision expresses a very clear preference for uneven-aged forest management because historical forest ecosystem research indicates clearly that, in these northern hardwood forests, that has been the “natural ecological function.”

At the same time, we recognized that there may be times when “Limited, judiciously applied, and environmentally-sound even-aged management (including clear-cutting) may be appropriate to provide certain ecological conditions, products, and experiences associated with early successional forests. It will be used only when uneven-aged management will not achieve the Vision.”

This remains exactly the standard that Nash Stream should be managed by. You have not shown any reason that even-aged management beyond what could already be done under this management principle is needed. If they are specific silvicultural needs that cannot be met under the 1995 Vision and management principles, tell the people of NH what they are.

If you do not tell us, we will assume that you simply want to cut more wood with less care.

Even-aged management typically generates more timber revenue per unit of cost — we know this. That doesn’t mean it is right, here.

The legislature of the State of NH is usually cheap and fails to provide enough funding for state agencies to do their jobs as well as you all and we all would like — we know this. That doesn’t mean it is right.

In the absence of any clear indication to the contrary, sensible observers will conclude that you are changing the Vision because you need to make more money. If this is the truth, say so.

Nash Stream is the crown jewel of state forests and needs to be managed accordingly, with proper agency staffing dedicated to that job. You have friends in this battle — don’t alienate them (us). If you present a management vision that undercuts the hard work, pride, and delight that the strongest champions of Nash Stream feel in this beautiful land and in having had a small hand in protecting it, we will oppose you in doing that.

Instead, I implore you, promote a Vision that envisions Nash Stream as it truly can and should be:

Nash Stream Forest will be a model of environmentally sound public land stewardship. Realizing it will take time to achieve, we intend to:

Manage Nash Stream Forest as a crown jewel within the ecology, landscape, and culture of the northern forests of New Hampshire and New England.

Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes. Use and build upon, rather than work in opposition to, ecological principles and natural tendencies. Manage the land with as little interference as possible with natural ecological functions.

Manage Nash Stream Forest as a model of ecologically-based forestry, emphasizing the growth of long-rotation, high quality, solid wood forest products that contribute to the economy of northern New Hampshire.

Continue to offer public access for traditional, low-impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas.

Maintain a process for ongoing public involvement in the management process, and a ten-year policy and technical review of the Vision and Management Plan.

Establish monitoring of, scientific research on, and education about the management and ecological processes of the land and water, and continue to emphasize the cooperative approach to protecting and managing Nash Stream Forest.

Please, don't let your greatest supporters, allies, and potential partners — the forest conservation/protection/ecological management community of NH — become your opponents. It is not good for you, it is not good for us, and it is not good for Nash Stream Forest.

I believe that your hearts thrill as much as mine does at the idea of being the champions of this Vision of Nash Stream — at the dream of being able to guide the development, growth, productivity, and beauty of this wonderful piece of land as it becomes the model and crown jewel that we all know it can be. Yes, there are myriad challenges, setbacks, and obstacles — such is life. There is never enough money. But if you let go of this dream and allow Nash Stream to become just another piece of plain vanilla forest, we all will have failed.

Please, let's do it right. It matters. If I can help, please let me know. I love this land and I have a great deal already invested in it. Let's not **** it up.

In addition to these comments about the Vision, I ask you to consider these concerns:

- Establish the control areas, inventory, and monitoring recommended in the 1995 plan. As you know very well, these are fundamental expectations of any good forestry. In the absence of having done these, you have no business proposing increases in management intensity.

- Nothing to say about climate change? We can be damn sure that one of the biggest influences on Nash Stream Forest in the coming decades will be a changing climate. It is irresponsible — indeed, nearly unimaginable — that this would not be a central feature of any Vision and management plan. I sure hope New Hampshire is not going to become one of those states where political “leaders” remove climate change from public policy documents.
- Provide ecological, recreational, and wildlife resources and opportunities that are not readily available on private lands. Focus on this — there aren’t that many places where we can manage for the qualities that come with old forests. Enjoy it! And we all know that one of the qualities of great forestry is patience. Use it.
- Establish more and bigger corridors between natural areas, and expand lower elevation natural areas.
- Explore how Nash Stream can be a cooperative ecological research and education forest. Connect with the USFS, Plymouth State University, UNH, Dartmouth, and conservation organizations. As an intact watershed, Nash Stream Forest is a wonderful resource.
- Continue with the 2017 formatting changes — if they are helpful for management, that’s fine.
- But stick with the content and direction of the 1995 Vision — as appropriately updated with new data.

I’m feeling more charitable now than I was at the beginning of this letter, but I am going to return to my original sentiment:

You can do better than this — and I believe you will. Let us help.

May the forest be with you — and may you be with the forest.

Respectfully,

Stephen Blackmer

Rev. Stephen Blackmer
Church of the Woods, Canterbury NH

Guinn, William

From: dan williams <ren_man_67@yahoo.com>
Sent: Friday, March 03, 2017 11:57 AM
To: DRED: Nash Stream Plan
Cc: Robert Bryan
Subject: BHA-New England comments: Nash Stream Forest Management Plan
Attachments: Backcountry Hunters and Anglers Nash Stream plan comments DRAFT 3-3-2017.docx

Dear Mr. Simpkins,

Please see the attached document for our comments regarding the NSF Management Plan.

Sincerely,

Dan Williams
New England Chapter Board Member, Backcountry Hunters and Anglers





BACKCOUNTRY HUNTERS AND ANGLERS New England Chapter

March 3, 2017

Brad Simpkins, Director
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301
nashstreamplan@dred.nh.gov

Board Members

Robert Bryan, Harpswell, ME
Tovar Cerulli, Plainfield, VT
Jeffrey Jenkins, Boston, MA
Eric Nuse, Johnson, VT
Kyle Rodd, Haydenville, MA
Dan Williams, Concord, NH

Dear Mr. Simpkins

Following are comments from the New England Chapter of Backcountry Hunters and Anglers on the January 18, 2017 draft of the Nash Stream Forest (NSF) Management Plan. BHA is the sportsman's voice for our wild public lands, waters, and wildlife and is the fastest growing group of sportsmen and women in the country. The New England chapter represents members from New Hampshire as well as the other New England states.

New England BHA Comments

1. NEBHA supports the overall goals of the plan and its use of the Wildlife Action Plan rankings to guide habitat management on the NSF (draft plan, Map 4) and the list of Species of Management Concern to guide wildlife management and monitoring (page 55).
2. Table 10. Target species of management concern with preferred habitat and management recommendations (p 56-62). DRED should add to the management recommendations as follows:
 - a. American Marten: management recommendations (p. 59) or supplemental guidelines should include targets for acres of stands that meet stocking and stand size class targets suitable for marten.
 - b. Moose: Winter recreation trails should not be located in or near moose wintering habitat.
 - c. White-tailed deer: Winter recreation trails should not be located in or near deer wintering habitat.
3. Wildlife Objective 2:
 - a. In the table of desired future condition for forest structure categories on page 64) (e.g. Regeneration, sapling, pole, etc.), these goals should be targeted toward each of the major forest types, not all types combined. It is our understanding that these goals do not include the unmanaged high elevation forests; we support exclusion of these areas when the landscape goals for any type of calculated. In addition, due to the large size of the NSF DRED should consider trying to achieve these goals at a smaller scale than the entire forest so that habitat diversity is appropriately distributed across the forest.
 - b. Strategy #2 (p, 64) should be more specific. Timber management plans should begin with landscape-scale planning based on these species and then lead to site specific plans that closely integrate habitat objectives for these species with timber and recreational objectives.
 - c. To achieve the desired distribution of forest stand-size classes this strategy should include target management operations goals for the next 10 years that will lead to the desired types

over time (i.e. acres of regeneration cuts to create young-forest habitat and acres of thinning to promote older forest habitat, with a target for a revised age-class structure at the end of the 10-year period.

4. Wildlife Objective3: Specific to commercial forestry operations, the use of the word "should" indicates that both wildlife strategies are optional. The language for strategy number 1 should be edited as follows:
 - a. "Managers shall identify which species from Table 10 are targeted by the operation and identify how the operation outcomes will lead to desired habitat conditions for those species."
5. Wild Brook Trout fisheries are a high priority for NEBHA, and the chapter supports the management and limitations on stocking identified on page 83.
6. ATV, UTV, and Motorized Trail Bike Use (p. 132-134).
 - a. While recognizing the economic importance of off-highway recreational vehicle use in the North Country, OHRV use is not consistent with the original intent of the Nash Stream Forest and has multiple adverse impacts on wildlife and wildlife habitat and conflicts with other recreational uses, as noted in the December 8, 2016 Technical Team briefing paper. NEHBHA further observes that the 1,000-mile "Ride the Wilds" trail system provides ample OHRV opportunities nearby but outside of the NSF.
 - b. NEBHA is firmly opposed to further expansion of the motorized trail network on the NSF and supports CORD's findings that expanded OHRV use (Option 3 in the 12/8/2016 briefing paper) is not consistent with the statutory principles (RSA 162-C:6) that established the NSF.
 - c. Long-term use of the Kelsey Notch trail should be conditional and subject to the review process outlined in the Dec 14, 2016 NH Council on Resource Development (CORD) decision.
 - d. Long-term use of any approved trails should be contingent upon monitoring demonstrating that trails are not having an adverse impact on water quality, wildlife habitat, and other recreational uses beyond the trail corridor, and that OHRV use is limited to the designated trails and does not result in unauthorized off-trail use.

Thank you for providing New England Backcountry Hunters and Anglers with the opportunity to comment on the revised Nash Stream Forest (NSF) Management Plan.

Sincerely,

Dan Williams
NEBHA Board Member
169 Portsmouth St, Unit 175
Concord, NH 03301

Robert Bryan
NEBHA Co-Chair
271 Harpswell Neck Road
Harpswell, ME 04079

Guinn, William

From: Robert Bryan <rbryan@forestsynthesis.com>
Sent: Friday, March 03, 2017 4:07 PM
To: DRED: Nash Stream Plan
Cc: 'dan williams'; Robert Bryan
Subject: RE: BHA-New England comments: Nash Stream Forest Management Plan
Attachments: Backcountry Hunters and Anglers Nash Stream plan comments FINAL 3-3-2017.pdf

Dear Mr. Simpkins,

Earlier today we inadvertently sent a version of our comments labelled "DRAFT." Please use the attached version labelled "FINAL."

Sincerely,

Dan Williams
Concord, NH
New England Chapter Board Member, Backcountry Hunters and Anglers



From: dan williams [mailto:ren_man_67@yahoo.com]
Sent: Friday, March 3, 2017 11:57 AM
To: nashstreamplan@dred.nh.gov
Cc: Robert Bryan
Subject: BHA-New England comments: Nash Stream Forest Management Plan

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Sincerely,

Dan Williams
New England Chapter Board Member, Backcountry Hunters and Anglers





BACKCOUNTRY HUNTERS AND ANGLERS New England Chapter

March 3, 2017

Brad Simpkins, Director
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301
nashstreamplan@dred.nh.gov

Board Members

Robert Bryan, Harpswell, ME
Tovar Cerulli, Plainfield, VT
Jeffrey Jenkins, Boston, MA
Eric Nuse, Johnson, VT
Kyle Rodd, Haydenville, MA
Dan Williams, Concord, NH

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Thank you for providing New England Backcountry Hunters and Anglers with the opportunity to comment on the revised Nash Stream Forest (NSF) Management Plan.

Sincerely,

Dan Williams
NEBHA Board Member
169 Portsmouth St, Unit 175
Concord, NH 03301

Robert Bryan
NEBHA Co-Chair
271 Harpswell Neck Road
Harpswell, ME 04079

Guinn, William

From: Dave Publicover <dpublicover@outdoors.org>
Sent: Friday, March 03, 2017 1:02 PM
To: DRED: Nash Stream Plan
Subject: Appalachian Mountain Club comments
Attachments: AMC Comments_2017 Draft Nash Stream Plan_3.3.17.pdf

Director Simpkins:

Please accept the attached comments from the Appalachian Mountain Club on the draft revised Nash Stream Forest Management Plan. If you have any questions about our comments please feel free to contact me.

Thank you.

David Publicover
Senior Staff Scientist/Assistant Research Director

Appalachian Mountain Club

603-466-8140

[Website](#) | [Facebook](#) | [Twitter](#) | [YouTube](#)

Your Connection to the Outdoors



**APPALACHIAN
MOUNTAIN CLUB**
YOUR CONNECTION TO THE OUTDOORS

March 3, 2017

Brad Simpkins, Director
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Re: Draft 2017 Nash Stream Forest Management Plan

Director Simpkins:

The Appalachian Mountain Club offers the following comments on the draft revised Nash Stream Forest Management Plan.

The AMC has been a strong supporter of the Nash Stream State Forest. We advocated for the state's purchase of the property and the Forest Legacy Program funding that made the purchase possible. AMC's Director of Conservation Steve Blackmer served as chair of the Advisory Committee that developed the original forest management plan for the property. AMC Senior Staff Scientist David Publicover served on the Nash Stream Citizens Advisory Committee from 1996 to 2004.

AMC also owns 74,000 acres of forest land in the 100-Mile Wilderness in Maine, about half of which is managed as natural area with the remainder available for timber harvests. Similar to Nash Stream, the property had a long history of commercial timber company ownership and has a large component of relatively young forest. Timber management of the property is in many ways similar to that set forth in the original Nash Stream management plan, with the goal of restoring more mature multi-aged forests producing quality sawtimber. The entire ownership is certified by the Forest Stewardship Council.

In the forward to the original Nash Stream Forest Management Plan, State Forester Jack Sargent described the plan as "*state-of-the-art*" and "*a model of public land stewardship*". We continue to agree with and support these overarching objectives. The development of the plan represented an excellent example of multi-stakeholder cooperation, and the resulting plan demonstrated a strong commitment to the emerging concepts of "ecological forestry". The timber harvests and other management actions (such as stream restoration projects) that we have observed on field trips have been well done and were consistent with the plan.

The original plan set forth a long-term vision for the management of the property. While new information may indicate the need for adjustments to the management plan, it is important that these adjustments stay true to the original vision. Of concern is that the draft revised Nash Stream Forest Management Plan improperly drops parts of the original vision and in other areas notably shifts away from this vision. These changes are made without any explanation or supporting information that would justify these changes. In addition, there are areas where

information critical to proper management is lacking, as well as new issues where policies need to be developed.

The original plan, developed with extensive input from a broad array of stakeholders, was something the state was justifiably proud of. However, the revised plan represents a change in course from the original vision and management approach that greatly concerns us. We believe that the following issues need to be addressed if the revised plan is to be worthy of the original vision for the crown jewel of New Hampshire's state forest system. We also believe that a revised draft needs to be prepared that adheres more closely to the vision of the original plan, which is developed with greater stakeholder consultation, and which should be presented for an additional round of public comment.

We offer the following comments on the draft revision.

Forest Inventory

The original plan (pages 25-29) presented information on the composition and structure of the forest based on the 1988 inventory. However, the comparable section of the revised plan (pages 89-93) does not contain comparable updated information. The section does indicate that collection of this information is proceeding on a compartment-by-compartment basis. This partial information suggests that the forest is moving in the desired direction toward "an older and more natural age/diameter distribution" (and we agree that this is likely). However, without comprehensive updated information the plan can only make qualified statements such as "we expect", "suggesting", "It seems like" and "it appears that".

The somewhat haphazard presentation of the partially updated inventory information makes it difficult to get a clear picture of the current condition of the Nash Stream Forest. In some cases the information seems inconsistent. For example: 1) The position of the forest in the stocking guide on page 92 (showing a forest that is close to the fully stocked A-line) is inconsistent with the estimated stocking of 13.1 cords/acre, which is quite low. Stands in this range would be expected to have in excess of 20 cords/acre¹. 2) Without more concrete information it is hard to have confidence in the idea that the forests of Nash Stream are growing nearly twice as fast as the average for northern New Hampshire. Reliance on the higher figure could lead to overestimating the allowable harvest on the property.

Accurate and periodically updated inventory data is critical to answering the most basic questions of forest management planning, such as:

- What is the current structure and composition of the forest?
- How fast is the forest growing?
- What is the balance between growth and past and projected harvesting?
- How has the forest changed due to past management, and how is it expected to change under the planned management regime?

The failure to have updated inventory information after almost thirty years of state ownership is both disheartening and unacceptable. It is our hope that this property would be managed to a standard that would make it eligible for FSC and SFI certification if the state chose to pursue

¹ There is an inconsistency in the conversion factors used in this section. On page 92 a conversion factor of 128 ft³/cord was used, while on page 93 the more appropriate 85 ft³/cord was used. It is possible that the low cords/acre values reported in both the original and revised plans are the result of using the incorrect conversion factor.

this. However, the lack of updated inventory information would likely be flagged as a major nonconformance under either standard.

We do not fault the Nash Stream management staff for this, as we recognize that they are operating under severe resource constraints. These constraints were described in the forward to the original plan (“...*the funding necessary to fully implement the Plan is not presently available in state government.*”) and the current plan (“*DRED does not have up to date inventory data for the entire property due to limited agency resources.*”). The fact that the state legislature has not seen fit to adequately fund the most basic operations of forest management for the state’s premier forested property represents a significant failure of government.

Sustainable harvest level

The plan does not contain essential information on the sustainable annual harvest level, or the relationship between past and planned harvest levels and growth. Since the goal is to move this forest to a more mature condition, one would expect harvest to be below growth for the near future at least. The revised plan states, “*Annual growth of timber will exceed annual removal within management zones for a period of several decades and probably long thereafter*”, and this is most likely true. However, the plan contains no supportive information to demonstrate this. The conclusion that goals are being met, minus supportive data, is subjective judgment, not “state-of-the-art” forestry.

The original plan did not include sustainable allowable cut figures, but recognized the need in one of the timber resource strategies (page 73): “*Evaluate each planning unit within the area suitable for timber management to determine a sustainable allowable cut.*” The revised plan retains this strategy (page 105). However, the fact that after nearly thirty years of ownership the plan still does not specify a sustainable annual harvest level is a serious concern, one that would almost certainly be flagged as a major nonconformance under both the FSC and SFI standards.

The revised plan contains some additional detail on the area control method used to regulate the forest. However, area control is primarily suited for even-aged management, and the vision for the Nash Stream forest is for dominantly uneven-aged management. The terms used in Table 15 (e.g. rotation age, regeneration acres) only make sense in an even-aged context, as do the forest structure goals (pages 64 and 106) and stocking table (Figure 11). How does one determine whether a shade-tolerant tree has reached rotation age when it may have remained a suppressed understory tree for many decades before being released? How does one calculate regeneration acres for a single-tree selection harvest?

While area control may be a useful guide to how much of the forest should be harvested annually, it cannot substitute for a sustainable allowable cut calculation. If area control is combined with a focus on harvesting the oldest, highest volume stands first then this approach could lead to harvesting in excess of growth for some time.

The revised plan must contain an estimate of sustainable annual harvest level, based on the best available inventory information and growth and harvest modeling. If assumptions must be made due to the lack of complete recent inventory data, they should be conservative to avoid overestimating the sustainable harvest level.

ATV use

Last year AMC strongly objected to the approach taken to establish new ATV trails. Our concerns were expressed in a joint letter from AMC, the Society for the Protection of New Hampshire Forests and The Nature Conservancy to the Council on Resources and Development on May 5, 2016 (Appendix A).

We also strongly object to the inclusion of a new bullet within the Management Vision (page 20) regarding ATV use. This use was not part of the original plan, and the current revision makes clear that it will remain a limited use². It is inappropriate that ATV use be elevated to its own bullet within the Vision, while all other recreational uses that are the major focus of the conservation easement and the management plan are encompassed within a separate single bullet. This elevation will provide the justification for a significant future expansion of this use that is inconsistent with the long-term vision for the property. It must be eliminated. If this use must be accommodated in the Vision statement, then it should be appended to the previous bullet as follows: *“Continue to offer public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking and snowmobiling in designated areas, and ATV use on a very limited number of designated trails”*.

Control areas

An important component of the original plan was the goal of designating representative “control areas” to ensure the full range of ecological diversity was encompassed within the system of natural areas. These areas were intended to complement the natural areas established by the easement and the original plan. Language within the original plan includes:

- Page 73: “Establish areas *within the designated commercial forest area* to study natural development and ecological processes of representative natural communities.” [italics added]
- Page 117: “Control areas will be established *to complement natural preserves* for research and education purposes to ensure that representatives of the full range of identified ecological communities that meet control area criteria remain largely unaltered by human activity.” [italics added]
- Page 119: “Research control areas will be established *in the area considered suitable for timber management* and will be protected from logging disturbance.” [italics added]

However, the concept of control areas has almost entirely disappeared from the draft revised plan – in fact the phrase “control area” does not appear anywhere in the revised draft. While some general language has been retained from the original plan³, the entire section within the original plan providing the greatest detail on the purposes for, and criteria for establishment of, control areas has been eliminated (original plan pages 78-80). Also eliminated was the entire section

² See page 133: “*Since the inception of the property, the recreational focus has been on traditional low-impact uses. ATV and UTV riding was never intended to be a major component of the recreation plan. While the original plan called for no motorized wheeled vehicles, it now allows for minimal motorized recreation in response to public demand for this developing sport and important economic driver in the North Country. This vision for recreation will be carried through to the next plan and will continue to emphasize traditional, low impact, recreation...No additional trails beyond the proposed Southern Connector Trail shall be entertained during the life of this plan.*”

³ See for example page 95 (Objective 2 Implementation), and page 99 (Objective 3 Strategy 6).

setting forth the management guidelines for natural preserves (original plan pages 117-118), as well as Management Guideline G.14 (original plan page 119). (Of the 30 timber management guidelines in the original plan, 29 were included nearly verbatim in the revised draft, with only the guideline dealing with control areas eliminated.)

It is clear that the original plan envisioned additional natural areas being set aside in addition to those designated by the easement. The designated natural areas (revised draft Section 4.2.3) are predominantly located at high elevation, on steep upper slopes, or soils unsuitable for timber management. The control areas were intended to identify additional natural communities or ecological conditions not encompassed by the designated natural areas. We note that the suggested criteria for selecting control areas (original plan page 80) include "Adequate representation of typical and important community/site combinations", indicating that the control areas need to include productive soils at lower elevations, not just steep upper slopes or unsuitable soils.

The only indication in the revised draft that this goal has been met is a slight change in wording from the original plan:

- Original plan page 63: "The system of core natural areas *will include* representatives...".
- Revised draft page 33: "The system of core natural areas *includes* representatives...".

This revised wording implies that control areas have been designated. However, the plan contains no information on these areas, including how they were identified and where they are located. What is clear is that, if these areas have been designated, they are located entirely within the existing system of natural areas, as there has been no change in the acreage of these areas (original plan Table 18; revised draft Table 2).

We think it is unlikely that control areas meeting the criteria set forth in the original plan could have been designated within the existing system of natural areas. As an example, we note that Important Forest Soil Group 1A (the most productive soils) encompass over 12,000 acres on the property, yet all but 300 acres lie within the Area Suitable for Timber Management (original plan Appendix 6, revised draft Table 13). This indicates that these productive soils are almost completely absent from the system of natural preserves. It is this type of absence that the control areas were intended to address. However, much like an out-of-favor Politburo member, it appears that all evidence of the need for control areas has simply been erased from history. This is unacceptable.

The vision, principles and guidelines for control areas included in the original plan must be restored. In addition, the revised draft needs to include an analysis of which community/site combinations are underrepresented in the current system of natural areas. (This would be equivalent to a gap analysis or the Representative Sample Areas analysis required by the FSC certification standard.) It should also include information on where the most suitable examples of the underrepresented communities are located and a timeline for their final delineation in the very near future.

Change in silvicultural emphasis

The original plan set out a clear vision for timber management on the forest:

- Vision, page 61: "Manage Nash Stream as a model of ecologically-based forestry, emphasizing the growth of long-rotation, high quality, solid wood forest products..."

- Page 62 (and elsewhere): "Uneven-aged management will be the method of choice for managing and regenerating timber stands."
- Page 87: "Forest management will focus on long rotation, uneven-aged techniques producing stands with big trees and many vegetative layers (high vertical stand diversity). A small percentage of the Forest will be managed to favor shorter-lived species with low shade tolerance, such as aspen and birch."

While the Vision statement has been retained in the draft revised plan, in many other places there has been a shift in emphasis away from the original vision and towards the increased use of clearcutting and even-aged management (Table 1). No explanation or rationale is given for this shift, and no information is provided to support the need for it.

We recognize that the draft revised Plan remains more sustainable and ecologically sound than standard commercial forest management. However, it represents a directional shift away from the original vision of "state-of-the-art" forestry and ecologically exceptional management that emphasizes a mature multi-aged forest structure, and towards a more typical or conventional forest management regime with a greater emphasis on early-successional habitat.

At the time of the original plan 8.4% of the upland forest was in seedling stands⁴. This proportion has declined significantly since then as the forest has matured under state ownership. This decline was anticipated and accepted in the original plan. (Original plan page 48: "*Future management of the Nash Stream Forest will favor older forest and reduce the size of young forest patches in comparison to present conditions... Species which reach their highest abundance in seedling stands will decline in numbers as the forest ages.*") The creation of new early-successional habitat was envisioned to be quite limited. However, the forest structure goals in the draft revised plan (set forth on pages 64 and 106) would maintain early successional habitat at levels (5 to 15%) that could exceed those that existed at the time of state purchase. This is clearly contrary to the original vision.

In addition, the draft revised Plan's forest structure goals would maintain between 35% and 55% of the forest in seedling, sapling, and pole stands. This is inconsistent with a dominantly long-rotation uneven-aged management regime, in which most stands would have an average diameter in the large pole to small sawtimber range, while varying in stocking over time as a result of periodic harvest.

The plan is unclear on the long-term plan for currently even-aged pole and small sawtimber stands. The initial entry will be a thinning, but that should not imply that these stands will ultimately undergo an even-aged regeneration harvest (clearcut or traditional shelterwood). The original plan clearly implies that these stands would transition to uneven-aged management.

The extensive use of the term "uneven-aged management" throughout both the original and revised plans can be confusing. In the strictest sense uneven-aged management requires the rigorous maintenance of a well-defined diameter distribution at the individual stand level. We understand why management staff may wish to reduce this emphasis. True uneven-aged management is labor-intensive, is not suitable for all stand types, and requires a long transitional period to implement in currently even-aged stands.

However, the definition for "uneven-aged stand" in the original management plan implies a somewhat broader approach:

⁴ Derived from original plan Tables 5, 6 and 7.

“A stand of trees that contains at least three well-defined age classes intermingled on the same area.”

There are a number of silvicultural systems that can maintain this type of stand configuration beyond traditional uneven-aged silviculture⁵. They can maintain the following characteristics of uneven-aged stands (which we believe are the core of the vision of the original plan) without requiring strict adherence to stand-level diameter distributions:

- Multiple age classes; regeneration, mid-sized trees and mature trees are present within most stands.
- Relatively high average stocking; stands cycle between moderately and well stocked.
- A component of large diameter trees and late-successional structure is present in all stands.

Among these hybrid or intermediate silvicultural systems are:

- *Deferred shelterwood*⁶: (Also called “shelterwood with retention”.) Under this system, the final shelterwood removal harvest is deferred, leaving a residual mature overstory that is retained until the regenerated understory is ready for an initial commercial thinning. A portion of the retained overstory may be harvested, while a portion is permanently retained to provide a recruitment source for late-successional structure. The goal is to maintain stands with at least three age cohorts and the continuous presence of mature and late-successional trees. This system is most suitable for even-aged stands and can serve as either a continuing system or a transitional stage from even-aged to uneven-aged management. This is the preferred silvicultural system on AMC lands.
- *Expanding gap shelterwood*⁷: This system is similar to the patch selection method but new patches are expansions of existing patches. As with deferred shelterwood, some portion of the stand should be retained to provide a long-term source of late-successional structure, though in this case it will be clustered rather than scattered. This system is more suitable for stands with high spatial heterogeneity.

These systems increase the flexibility of management staff to target harvesting to different stand types and conditions, while meeting the vision of the original plan to manage for a forest dominated by mature uneven-aged (or at least multi-aged) stands. We believe that the revised plan should include discussion of these systems, and make clear that uneven-aged management is to be interpreted in a broad rather than a narrow sense. As it stands the plan gives the impression that the only choice is between traditional uneven-aged and traditional even-aged systems (single-tree or group selection versus clearcutting or shelterwood). We believe that most harvesting should and likely will fall in between these two extremes.

⁵ AMC’s management plan uses the term “multi-aged” to describe this silvicultural approach which is intermediate between pure even-aged and pure uneven-aged. The revised Nash Stream plan should incorporate this term to help clarify the broadly-defined meaning of “uneven-aged” in the original plan.

⁶ Raymond, P., Bédard, S., Roy, V., Larouche, C. and Tremblay, S. 2009. The Irregular Shelterwood System: Review, Classification, and Potential Application to Forests Affected by Partial Disturbances. *Journal of Forestry* 107: 405-413.

⁷ See <https://extension.unh.edu/articles/Expanding-Gap-Shelterwoods-Flexible-System-Regenerating-Mjd-tolerants>.

Forest structure goals

As noted above, the forest structure goals in the revised draft (pages 64 and 106) are inconsistent with, and inappropriately applied to, a forest intended to be dominated by mature multi-aged stands. For example, according to Table 15, regeneration cutting would encompass about 0.75% of the timber management area per year (161/21613). Assuming that the regeneration phase lasts 15 years, about 11% of the forest would be in regeneration acres – near the midpoint of the forest structure goal for this size class. Thus it appears that this forest structure goal can be met *only if most harvesting is by even-aged regeneration harvests*. This is clearly contrary to the vision of the original plan.

For forests dominated by continuously uneven-aged or multi-aged stands without a clear regeneration stage, the target forest structure is better expressed through a desired diameter distribution (expressed as percent of basal area) rather than a stand size-class distribution (expressed as percent of acres). Unlike pure uneven-aged management this diameter distribution would be applied at the property or compartment level rather than the individual stand level. An example of this type of distribution is shown on page 37 of *Good Forestry in the Granite State, second edition*. A distribution based on standard uneven-aged parameters corresponding to long-rotation management⁸ would have the following general distribution:

<u>Size class</u>	<u>Percent of basal area</u>
Small poles (5-7" DBH)	20-30%
Large poles (8-9")	15-20%
Small sawtimber (10-14")	30-40%
Large sawtimber (15"+)	25-30%

We believe that this type of forest structure goal is more appropriate for the management scheme envisioned for Nash Stream.

Also, we note that the target age for northern hardwoods has been reduced from the original 140 years to 120 years. We have stated our belief that rotation age is an inappropriate parameter to use in a dominantly uneven-aged management regime. However, if this parameter is retained it should remain at the original 140 years. A rotation based on culmination of mean annual increment is a standard rotation, not a long rotation. As noted by Leak et al. (2014; page 23)⁹:

“Mean annual board-foot growth (gross volume) for managed [northern hardwood] stands levels at about 150 board feet/year at ages 107 to 119 years, which is a reasonable, minimum rotation age for quality sawtimber products. Rotations up to 120 to 140 years are quite within reason for long-lived species.”

Biological legacies

“Biological legacies” include structures common in late-successional forests, such as large diameter standing live and dead trees and large coarse woody material. Restoring and maintaining these structures is a goal of all ecologically-focused forestry. However, there is limited discussion of these ecologically critical components in the management plan. The

⁸ Q-factor of 1.3 and maximum DBH of 24"; this stand would have a QMD of 8.9".

⁹ Leak, William B.; Yamasaki, Mariko; Holleran, Robbo. 2014. *Silvicultural guide for northern hardwoods in the northeast*. Gen. Tech. Rep. NRS-132. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station.

primary guidance is provided by Timber Management Guideline 14 (page 109), which states in part, “*Characteristics of older successional stages such as large old trees, dead standing trees, dead downed trees, rotting wood in shade, and healthy, vigorous trees will be encouraged where possible*”. This language is unchanged from the original plan but should be strengthened. We propose the following language to replace this:

“The recruitment and retention of structures characteristic of older successional stages (“biological legacies”) such as large old trees, dead standing trees, dead downed trees, rotting wood in shade, and healthy, vigorous trees will be a focus of management. A portion of overstory trees will be permanently reserved in most harvest units to allow for the development of these late-successional structures.”

Climate change

Climate change receives very limited attention in the revised plan, primarily in section 8.2.2.7 on forest carbon as a forest product. We were flabbergasted to read the following sentence:

“The interest of some scientists is in the ability of the forest to store increasing amounts of carbon that otherwise would be in the atmosphere and therefore reduce the amount of greenhouse gas believed to cause so-called ‘anthropogenic or human-induced climate change’.”

Climate change is not “so-called”. There is an overwhelming scientific consensus that climate change is real and that human greenhouse gas emissions are a primary contributor. This reality has been accepted by the global scientific community (as documented in the work of the Intergovernmental Panel on Climate Change¹⁰) as well as the governments of the 197 nations who are parties to the Paris Climate Agreement.

The use of such waffling language is unacceptable in a professional natural resource publication, and only serves to appease those who refuse to accept this scientific consensus for ideological reasons. This sentence should be rewritten to read:

“Forests across the region have the capacity to sequester significantly greater amounts of carbon and therefore reduce the level of atmospheric greenhouse gasses that are a primary cause of anthropogenic climate change.”

The second paragraph of section 8.2.2.7 contains misleading, out-of-date and inaccurate information. We suggest the following revision:

Forest carbon is now recognized as an “ecosystem services” commodity that under certain conditions can be monetized through sale to emitters to balance (“offset”) their carbon emissions. The emitters may be driven by regulatory requirements or voluntary corporate or individual social responsibility commitments. In return for payment, the offset provider commits to maintaining the sequestered carbon for a long period (generally 100 years). Protocols for quantifying, registering and tracking “forest carbon offsets” are well developed. Currently the primary market for forest carbon offsets is the California regulatory cap-and-trade system. This system is scheduled to end in 2020 but could be extended. Voluntary markets can be accessed through several registries including the California-based Climate Action Reserve and the American Carbon Registry; prices for voluntary offsets are generally

¹⁰ See https://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf.

lower and the long-term future of these markets is unpredictable. Because of the high cost of developing forest carbon projects, financially viable projects generally require several thousand acres of forest with stocking above the regional average. Forest carbon offset projects can be developed on both reserve and managed lands and include carbon storage in long-lived wood products. To date nine forest carbon offset projects encompassing nearly 400,000 acres have been completed across northern New England and New York.

We also believe that the revised plan should include an additional section that specifically addresses climate change issues, describing both how the forests will be managed for resilience to climate change as well as how management can contribute to combating climate change. Guidance on these issues is given in a number of publications, including Swanston and Janowiak (2012)¹¹, Perschel et al. (2007)¹² and Ruddell et al. (2007)¹³. Developing such a section should not be difficult, as the original management vision for the Nash Stream Forest was very “climate friendly” and incorporated many of the recommendations in these publications, such as:

- Managing a significant component of the property as natural area.
- Managing for mature well-stocked stands.
- Managing for high-quality wood products which maintain carbon in long-term storage.
- Maintaining high levels of high-carbon late successional structures (large live and dead trees and coarse woody material).
- Maintaining diverse species mixes to allow multiple regeneration options.
- Limiting intensive harvests to avoid loss of forest floor and soil carbon.
- Restoring connectivity of aquatic habitats.

Riparian buffers

The riparian management zone guidelines were adapted from *Good Forestry in the Granite State*. These guidelines represent the minimum level of acceptable practice for forest management on private lands. The state’s premier forest, which holds itself up as “model of ecologically-based forestry”, should hold itself to a higher standard.

We propose the following improvements to this section:

- Intermittent streams: Intermittent streams with well-defined stream channels showing evidence of prolonged seasonal flow should have a no-management buffer of 15 feet. Other intermittent channels that carry water only for a short period do not require a no-management buffer, but a note should be added stating that no trees should be cut within or directly adjacent to the channel. In addition, the buffer width on these latter streams could be reduced to 25’, as the primary purpose is to keep logging equipment out of these channels.
- Perennial streams: The no-harvest buffer on all perennial streams (including 1st, 2nd and 4th order) should be increased to 50 feet. The statement about the importance of woody debris input to 3rd order streams also applies to 1st and 2nd order streams, where this input creates pool-and-riffle habitat and helps to stabilize stream channels by retarding

¹¹ Swanston, C. and Janowiak, M., eds. 2012. Forest adaptation resources: Climate change tools and approaches for land managers. Gen. Tech. Rep. NRS-87. USDA Forest Service, Northern Research Station, Newtown Square, PA.

¹² Perschel, R.T., A.M. Evans and M.J. Summers. 2007. Climate Change, Carbon, and the Forests of the Northeast. Forest Guild, Santa Fe, NM.

¹³ Ruddell, S. et al. 2007. The role for sustainably managed forests in climate change mitigation. *J. of Forestry* 105: 314–319.

- sediment movement and reducing flow speeds. This distance is still less than one average tree height.
- Great Ponds: The no-management zone should be increased to 150 feet to be consistent with the conservation easement.
- Ponds <10 acres: These ponds should have no-management zones consistent with the streams entering and draining them, but in no cases should it be less than 15 feet.

These guidelines are consistent with those that AMC applies on its own land.

Also, guidance should be added that makes clear that these riparian zones widths are a guide, but that actual buffer widths will be determined in the field based on topography, soils, etc. These buffers should be expanded as necessary to encompass adjacent areas of nonforested wetland, steep slopes, fragile or wet soils, or patches of notably mature trees.

Biomass harvesting

While the plan recognizes chips used for energy production as a forest product, the plan includes no guidance on biomass harvesting or the use of whole-tree harvesting. The presence of the biomass plant in Berlin provides a ready market for this product, and we assume that some material is sold to this market. The Plan needs to include strong guidance on biomass removals and whole-tree harvesting to limit the ecologically damaging impacts of excessive removal of biomass. We encourage you to adopt the guidance developed by the Forest Guild¹⁴.

SUMMARY

The AMC appreciates the work that has gone into revising the Nash Stream Forest management plan. We also appreciate the work of the Nash Stream Forest staff, who we realize are operating under severe legislatively-imposed resource constraints. The on-the-ground work we have seen has been excellent. However, the draft revised plan has made a number of unacceptable changes that depart from the vision presented in the original plan, which emphasized the use of uneven-aged management to restore and maintain a dominantly ecologically mature, structurally complex forest. The revised plan sets forth a more conventional management approach with a greater emphasis on even-aged management and early-successional habitat. The original plan was developed with input from a broad range of stakeholders, and there is no rationale or justification given in the revised draft for such a significant change in management focus and goals. Nash Stream Forest was intended to be exceptional, not conventional.

The state should prepare another draft of the revised management plan for public comment. The revised draft should adhere more closely to the original vision, while incorporating new information and circumstances as appropriate. In preparing this new draft the staff should reach out to a broad range of stakeholders to ensure that any changes to the vision and management approach are justified, supported with real information, and have broad support. As it stands, we fear that these changes are driven more by financial constraints than ecological needs.

In particular, the revised draft should:

¹⁴ Forest Guild Biomass Working Group. 2010. **Forest Biomass Retention and Harvesting Guidelines for the Northeast**. Forest Guild, Santa Fe, NM.

- Present the best available inventory information in a consistent and coherent form so that readers can better understand the current condition of the property and how it has changed since state purchase.
- Include a calculation of the sustainable harvest levels, and how past and projected harvest levels compare to estimates of growth.
- Remove the bullet in the Vision statement dealing exclusively with ATV use.
- Restore control areas to the status they had in the original plan, and restore the guidelines on the management of natural areas. Based on available information, we have serious concerns about whether the control areas, if they have been designated, satisfy the criteria in the original plan. The plan needs to include information on how the range of community/site combinations are represented in the current system of natural areas (a gap analysis) and set forth a clear plan and timeline for establishing control areas for underrepresented communities.
- Restore the original plan's emphasis on long-rotation uneven-aged management and very limited use of clearcutting. The definition of uneven-aged management should be expanded to encompass multi-aged silvicultural systems such as deferred shelterwood and expanding gap shelterwood. These systems can meet the ecological goals of uneven-aged management without strict adherence to stand-level diameter distribution, while providing more options for regenerating stands.
- Forest structure goals should be changed to utilize uneven-aged rather than even-aged terminology and parameters, as this is intended to be the dominant management system. In addition, the forest structure goals should be based on long-rotation management and the restoration and maintenance of a high level of late-successional structures.
- Additional information on climate change should be added. This should describe both how the forests will be managed for resilience to climate change as well as how management can contribute to combating climate change. In addition, the scientifically inappropriate language referring to "so-called" climate change must be corrected.
- Strengthen the designation of riparian buffers.
- Include guidance limiting the extent of biomass harvesting.

In addition, though it is beyond the scope of this plan, we strongly encourage the General Court to adequately fund the management staff of the Nash Stream Forest. Without adequate funding, the ability of the staff to manage the forest as "a model of public land stewardship" will remain limited. The State should take pride in Nash Stream Forest, and the proper public investment in its management would not be wasted.

We strongly believe that you can and must do better.

We thank you for the opportunity to present these comments. If you have any questions, please contact David Publicover at 603-466-8140 or dpublicover@outdoors.org.

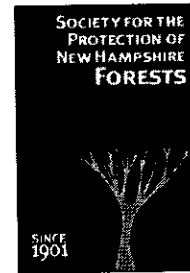
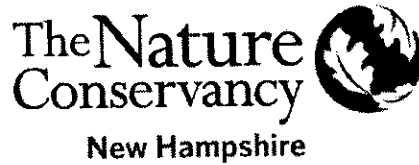
Sincerely,

David Publicover
Senior Staff Scientist

Susan Arnold
Vice President for Conservation

Table 1.

Original Plan		Draft Revised Plan	
Page		Page	
62, 120	Uneven-aged management will be the method of choice for managing and regenerating timber stands.	94	Uneven-aged management will be used for managing stands with complex tree structures where the goal is to provide diverse within-stand age class and habitat conditions...
62, 120	Limited, judiciously applied, and environmentally-sound even-aged management (including clearcutting) may be appropriate to provide certain ecological conditions, products, and experiences associated with early successional forests.	94	Even-aged management (including clearcutting) will be utilized to: (1) provide normal maintenance of even aged stands (tending) such as with improvement cutting and thinning, (2) to regenerate a range of species from shade tolerant to shade intolerant tree species, (3) develop or maintain certain identified ecological conditions, habitat conditions for certain identified plant or wildlife communities, and (4) provide recreational experiences associated with young forest conditions or simple structured stands in a context of a diverse forest landscape.
62	[Clearcutting] will be used only when uneven-aged management will not achieve the Vision.	98	Clearcutting will be used when deemed to be the best silvicultural method to accomplish the desired condition.
73	Use uneven-aged management as the preferred method for managing and regenerating timber stands.	99	Use even-aged or uneven-aged management as described above for managing and regenerating timber stands.
97	Even-aged management will be an accepted silvicultural method, but restrictions on clearcutting will be more stringent than in the CED.	99	Even-aged management will be an accepted silvicultural method, but restrictions on clearcutting are set forth in the CED.
103	Table 21: target age for hardwoods/fine tills of 140 years.	101	Table 14: target age for hardwoods/fine tills of 120 years.
103	...research indicates that sugar maple generally matures at 20 to 24 inches in diameter at breast height (DBH) and culminates growth at approximately 140 years of age.	102	Research indicates that mature stands are generally dominated by sugar maple with 16 to 18 inch diameters at breast height.
105	Figure 16: Expected Distribution of Harvest Openings.	64	Forest structure guidelines.
48	Future management of the Nash Stream Forest will favor older forest and reduce the size of young forest patches in comparison to present conditions... Species which reach their highest abundance in seedling stands will decline in numbers as the forest ages.	64	The desired future condition of habitats in the NSF includes a mix of forest age classes across the landscape...Currently the NSF lacks a significant component of regenerating forest.
99	[Clear]Cuts will be relatively small...	98	Clearcuts will be appropriately sized...



May 5, 2016

Meredith Hatfield
Chair, NH Council on Resources and Development
NH Office of Energy and Planning
107 Pleasant Street, Johnson Hall
Concord, NH 03301

Dear Director Hatfield and Council members:

Our three organizations are writing to advise you of our deep concern about the legal status of the two existing ATV trails in Nash Stream State Forest. After careful review of the most recent Nash Stream Management Plan, as well as the existing New Hampshire statutes governing ATV trails on state lands, we conclude that the existing trails on the Nash Stream property are not in compliance with state law.

Our organizations are not opposed to the use of ATV's for recreational purposes, nor are we opposed to the development of ATV trails on certain state lands. However, we remain concerned about current – and the potential for increased - ATV access in Nash Stream State Forest.

Unfortunately, because the state has failed to adhere to the law, our organizations are compelled to raise concerns because these trails may threaten the natural resource values these laws are intended to protect. We request that upon reviewing the requirements of RSA 162-C:6, II & III, the Council determine that the existing ATV trails are not in compliance with the law and take appropriate action.

It is vitally important that CORD provides the management oversight necessary to ensure that all trails in Nash Stream are compliant with statute, and that the establishment of trails follows a transparent and open public process. We urge CORD to take the time necessary to thoroughly examine the history of the Nash Stream acquisition, and the decision making process that has led the state to have ATV trails operating in the State Forest in violation of state statute.

AMC, SPNHF and TNC's interest in Nash Stream

In 1988, the state's Land Conservation Investment Program (LCIP) approved a grant of \$7.65 million in state funding for the purchase of more than 40,000 acres of land, including the self-contained Nash Stream watershed (totaling 39,503 acres in the towns of Stark, Odell, Stratford and Columbia). At the same time, The Nature Conservancy (TNC) and the Society for the Protection of New Hampshire Forests (SPNHF) jointly guaranteed a loan of \$5.1 million to bridge the difference between the LCIP grant and the full purchase price of the Nash Stream watershed.

A closing took place on October 27, 1988 where the state of NH purchased 46,679 acres for \$12.75 million and re-conveyed 4,496 acres to the Forest Service for \$1.175 million. The Forest Service also agreed in principle to share the costs of the Nash Stream acquisition through the purchase of a Conservation Easement on the property. As the terms of the easement were being negotiated, SPNHF and TNC loaned the state \$3.925 million to provide the balance of the purchase price.

Finally, on August 4, 1989, the Conservation Easement on Nash Stream was sold to the United States of America for \$3.95 million and the TNC/SPNHF loan was repaid with appropriate interest. Today, Nash Stream Forest is NH's largest single state forest.

Our three organizations were advocates at the time for state acquisition of the Nash Stream State Forest, and have since been actively engaged in collaborative efforts – including serving on the Nash Stream Citizens Committee - to manage the land for the benefit of the citizens of the State.

The LCIP originally conserved this land for two primary reasons. The first was to protect the entire Nash Stream watershed as an ecologically intact working forest, for the property's natural resource values, including the economic value associated with sustainable management of the timber resources. The second reason was to reserve for the public the traditional recreational uses of what had long been privately owned and managed forest land. It should be noted that ATV use was not a traditional use [previously allowed by private landowners], and the original DRED forest management plan for Nash Stream specifically prohibited ATV use.

Role of Council on Resources and Development

The Council on Resources and Development (CORD) was created to provide a forum for interagency cooperation to assure consistency in the implementation of established policies relating to the environment, natural resources, and growth management issues under RSA 162-C.¹ Specifically, per RSA 162-C:6, II & III, CORD has management and administrative responsibilities for state lands purchased under the LCIP.

II. In addition to its other responsibilities, the council shall manage and administer the lands acquired and funds established under the land conservation investment program under the former RSA 221-A, according to the provisions of this subdivision and consistent with agreements entered into with persons with ownership interests in such lands.

III. The council shall manage the lands acquired under the former RSA 221-A so as to preserve the natural beauty, landscape, rural character, natural resources, and high quality of life in New Hampshire. The council shall maintain and protect benefits derived from such lands and maintain public access to such lands, where appropriate.

In reviewing RSA 162-C:6, it is evident that CORD has both the statutory responsibility to ensure that LCIP lands are being managed in accordance with state law and regulations, and the authority to affect the on the ground management of these properties. There is no other agency or office of state government authorized in statute with the oversight responsibilities of these important lands,

¹ <https://www.nh.gov/oep/planning/programs/cord/>

purchased using public dollars, and held in the public trust. It is critical that CORD exercise its statutory authority when management of these resources is shown to be detrimental to those resources, or in clear violation of state statute.

In the specific case of Nash Stream, the Department of Resources and Economic Development (DRED) is responsible for the day to day management of these lands, following an established Management Plan, and adhering to existing state statutes governing the agency and its work. If CORD finds that DRED is not properly managing LCIP lands under its control, CORD needs to take corrective action.

Existing Trails in Nash Stream in Clear Violation of RSA 215-A: 42.

Our review of available information suggests DRED did not follow existing state law when establishing ATV trails on the Nash Stream property; the first of which (the West Side Trail) began operation as a pilot in 2002, and an additional trail, the Kelsey Notch trail, was established by DRED as a pilot in 2012.

RSA 215-A: 42 is clear that specific criteria must be met before any ATV trails are established on state owned lands:

No ATV or trail bike trail shall be established after the effective date of this paragraph or subsequently maintained on state-owned property unless all of the following [four] conditions are met:

There is no ambiguity in this language, and the statute is unequivocal that not just some of the conditions (a-d below) of the statute need to be met before trails can be established, but DRED is required to ensure that all conditions explicitly outlined in statute are met.

The four conditions set forth in RSA 215-A:42 are:

(a) The property has been evaluated by the bureau in cooperation with the department of fish and game and the department of resources and economic development, division of forests and lands, and other state agencies that are custodians of the property using the coarse and fine filter criteria, established under RSA 215-A:43, and has passed such criteria as determined by the commissioner of the department of resources and economic development and the executive director of the department of fish and game.

To our knowledge, DRED has never made publicly available any of the "coarse filter" and "fine filter" reviews required for each of the existing ATV trails in Nash Stream. In reviewing CORD's meeting minutes of last year when this topic came up several times, there is no indication that DRED has informed CORD when and if these reviews have been done. CORD should require DRED to provide to CORD and the public the completed analysis for each trail per the coarse and fine filter requirements set forth in RSA 215-A: 43.

(b) A memorandum of understanding (memorandum) exists between the bureau, the fish and game department, the department of resources and economic development, division of forests and lands, and all other state agencies that are custodians of the property. The memorandum shall include, but not be limited to, the responsibilities that each agency has in monitoring,

maintaining, and enforcing relevant laws relative to the trail and the type of OHRV permitted on approved trails. The bureau shall enter into the memorandum only if it is certain that proper monitoring and maintenance of the trail shall occur, either through its own resources or those of others. The fish and game department shall enter into the memorandum only if it can commit sufficient resources to reasonably monitor for proper ATV or trail bike use on the property and enforce the applicable laws.

According to CORD's public meeting minutes of July 8, 2015, a DRED staff representative replied to an inquiry that he "did not believe" any memorandum of understanding exists for any of the Nash Stream ATV trails. Operating a trail system on state lands without an existing MOU is a major concern because the State's capacity to monitor and enforce ATV laws is already stretched thin. If such a memorandum does exist, it should be immediately transmitted to CORD.

(c) A written agreement is in effect between the bureau and a locally-organized ATV or trail bike club recognized by the bureau that details the club's ongoing responsibilities, including but not limited to, monitoring the use and condition of the trail, erecting signage, educating operators, performing maintenance, and monitoring compliance with laws and regulations. Should the club fail to fulfill some or all of its responsibilities, the bureau or its agent may assume such responsibilities provided sufficient resources are available and committed.

We have been provided with two written agreements for the ATV trails in Nash Stream. One is between DRED and the North Country ATV Club for the West Side Connector Trail, signed in February of 2013 with no expiration date. The second agreement is between the Metallak ATV Club and DRED, covering the Kelsey Notch pilot trail for a three year period, and was signed in May 2013. This agreement expires at the end of May 2016. If CORD has not already done so, it should request that DRED provide all agreements required under this statute for ATV trails in Nash Stream, and ensure that the agreements are up to date and complete and that they are being monitored for compliance with statute.

d) A management plan exists for the property that specifically allows ATV or trail bike use on the property, and the ATV or trail bike trail does not otherwise conflict with the management plan. Any state agency proposing to establish or change a management plan that affects ATV or trail bike use on state property shall publicize such plan and provide the public with the opportunity to comment on the plan before enactment.

While the 2002 management plan for Nash Stream does allow for one trail (the West Side Connector), it specifically prohibits any additional trails being developed on the property. Specifically, amendments were made to the management plan on page 50 to make this point quite clear:

"Beginning in the summer of 2002, about 7.6 miles of trail are now available for ATV travel utilizing the Bordeaux Trail (aka the Farrer Brook Trail #14 Map 3 page 24), the West Side Road (#52 Map 3), and the Andritz Trail (aka Stratford Mtn Rd #44 Map 3). This is a pass through trail set up as a pilot project for 3 to 5 years beginning the summer of 2002. No other roads or trails are open to ATV's on the property."

In 2012, DRED approved a new "pilot trail" - Kelsey Notch - which is explicitly not permitted by the existing management plan for the Nash Stream State Forest. The language of the management plan is quite clear: the West Side Trail is the only ATV trail allowed in Nash Stream. Without amendments to the Nash Stream management plan, the Kelsey Notch Trail is not permitted. In fact, there appears to be no statutory authority for DRED to establish "pilot" OHRV or ATV trails on lands acquired by the LCIP. There have been no amendments to the Nash Stream Management plan that would allow DRED to establish any additional ATV trails on the property. DRED had no authority to authorize ATV use of the Kelsey Notch Trail.

Conclusion

The core issue we would like CORD to address at this time regarding ATV use of trails in Nash Stream is whether current law is being complied with, and, if not, what the appropriate remedy is. As discussed above, we believe the existing trail network in Nash Stream is not in compliance with RSA 215.

Nash Stream was purchased by the state through the LCIP program using public dollars. CORD has a statutory obligation to administer and manage these lands in keeping with the values and purposes for which the lands were purchased. A key component of the proper management of these lands is ensuring that activities being carried out on them are in compliance with state statute. Unfortunately, in the case of the ATV trails in Nash Stream, it appears that DRED has not followed the letter, or the intent, of the laws governing such trails on state lands. The remedy is for CORD to assure compliance, and to ensure that there is a well-informed and transparent public process when contemplating the continued use, or potential expansion, of ATV trails in Nash Stream.

Thank you for your prompt attention to this matter. We are available to meet and discuss this important issue at your convenience.

Sincerely,

Will Abbott
Vice President Policy
Society for the Protection
of NH Forests

Susan Arnold
Vice President for Conservation
Appalachian Mountain Club

Jim O'Brien
Director of External Affairs
The Nature Conservancy

Guinn, William

From: Christine Page <CNMPage@AOL.Com>
Sent: Friday, March 03, 2017 1:19 PM
To: DRED: Nash Stream Plan
Subject: Opposition to ATV Trails in the Nash Stream State Forest
Attachments: NashStreamLetter.docx

Dear Director Simpkins,

Please find attached my letter in opposition to creation of new ATV trails in the Nash Stream State Forest.

Respectfully yours,
Christine Page

7307 MacArthur Blvd
Suite 215
Bethesda, MD 20816

March 3, 2017

Brad Simpkins
Director
New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands
172 Pembroke Road
Concord, New Hampshire 0331

Attention: Nash Stream Forest Plan

Dear Mr. Simpkins:

Please think carefully about the negative impact that expanding ATV or OHRVs use in the Nash Stream Forest would inflict.

Nash Stream and its surroundings provide a healthy, beautiful, natural environment to plants, animals, and human beings. Increasing ATV/OHRV use in this area would disrupt and harm this lush, life-affirming habitat in multiple ways. Air, noise, water, and soil pollution, and ecosystem disruption as well as diminished space for plants, animals, and humans would occur as a result. As a long time visitor and great lover of this beautiful natural haven, I voice my opposition to expanded ATV/OHRV use, and I implore you to please think carefully about your response to the ATV enthusiasts. Expanding ATV/OHRV use in the Nash Stream Forest will lead to harmful environmental consequences, diminishing the areas pristine and exquisite natural solitude enjoyed by so many.

Thank you for your time and thoughtful consideration.

Sincerely,

Christine Page

Guinn, William

From: wilshy @worldpath.net <wilshy@worldpath.net>
Sent: Friday, March 03, 2017 1:28 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Plan. Public Comment. From Cohos Trail Association. See Attachment
Attachments: NASH STREAM FOREST PLAN DRAFT. Motorized recreation PDF.pdf

To: Brad Simpkin,

Hello Brad, attached is a hard copy of a public statement (PDF) from The Cohos Trail Association regarding the Nash Stream Forest plan as it pertains to ATV use.

Kim

Kim R. Nilsen, founder
The Cohos Trail Association
Post Office Box 82
Lancaster, NH 03584

COHOS TRAIL ASSOCIATION

Post Office Box 82, Lancaster, NH 03584

NASH STREAM FOREST ATV ACCESS PUBLIC INPUT

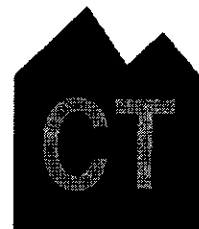
Since 1999, the Cohos Trail Association has had the privilege, thanks to NH Dept. of Resources and Economic Development officials, to be able to develop foot trails and trail infrastructure within the 39,600 acre Nash Stream Forest. We at the association see the Nash Stream Forest as a distinct regional gem – ecological, historical, geological – that the 170-mile Cohos Trail rambles through.

It is our desire to see the Nash Stream Forest remain a quiet refuge where the traditional uses as outlined in the very first plan for the Forest continue to be given the utmost priority: hunting, fishing, hiking, and, in winter, snowmobiling, snowshoeing and cross-country skiing.

We recognize that new recreational opportunities for citizens may arise on occasion as new inventions or new technologies arise. The advent of the personal All Terrain Vehicle is a case in point. But we also recognize that some activities, particularly motorized activities, impinge on the experience of other recreators and can have high impacts on the environment.

In our brief experience with ATV traffic in Coos County, we can say the Cohos Trail route has certainly been negatively impacted by the development of ATV corridors. We have had blaze trees felled and signage removed as corridors were widened. Once grassy lanes on slopes have severely eroded in places. Noise and dust have become a quality factor in a number of locations along more than a dozen miles of the original Cohos Trail 170-mile route.

In the Nash Stream Forest, our interaction with ATVs is relatively minor, but we would request that it remain so. At present, we share about a mile of the West Side Trail with ATV traffic and a similar distance along the Kelsey Notch Road in the Columbia-Dixville boundary lands.



In our minds, hiking and ATV activity are not compatible. Safety is a major concern for both hikers and ATV riders. Dust in the environment is another concern. The noise of engines and wheels rolling on rough surfaces impacts whole areas where the machines operate, robbing people on foot of the peace and quiet they have traditionally come into the Nash Stream Forest to experience.

The Cohos Trail Association would like to request that the State consider granting the association the ability to create bypass paths to move foot trail off of any and all ATV corridor presently in existence within the Forest and off any ATV corridor that may be approved within the Forest. By moving foot trail off of ATV lanes, all parties would benefit, we suspect. The State would avoid conflict between different recreational interests. The ATV enthusiasts would avoid people on foot altogether. Hikers would not have to confront moving machines in the woods, and female hikers would no longer be exposed to and be on guard about unknown male riders operating in remote locations. We would also like to request, should creating substantial bypasses of ATV corridors be necessary, that the State give priority to relocation of foot trails off ATV corridors, work with The Cohos Trail Association to expedite relocation, and assist the association in procuring necessary grant funds and other resources so that new bypass paths may be cut in keeping with the State's best practices guidelines.

Furthermore, the Cohos Trail Association would advocate for no new motorized trail miles created within the Forest and use of existing hardened surface lanes be tightly restricted, as we do not wish to see the Forest degraded physically and audibly. We do not wish to see undue amounts of State resources funneled into the Forest so that a single user group may have suitable hardened surfaces to ride on.

All terrain vehicles are, after all, capable of moving dozens and hundreds of miles in relatively short periods of time. Given that fact, the layout of the Nash Stream Forest in the greater central Coos County environment is not an impediment. The Kelsey Notch Road provides an avenue between Connecticut River watershed ATV systems and Androscoggin River watershed ATV corridors.

Along the southern boundary region of the Nash Stream Forest, there simply is no hardened surface lane that runs the entire way west to east. The hard-pack-based Jimmy Cole Brook Road dead ends at the massive barrier of Long Mountain. South of that road, the Kauffmann Forest conservation land impedes any ATV corridor development to the south and east.

A simple and essentially no-cost solution to an east-west ATV route in the south would be for the NH Department of Transportation to take up the possibility of allowing ATV enthusiasts to travel 12 miles from Groveton village to West Milan village on Route 110. This would allow the link between the Connecticut River watershed ATV corridors and the Androscoggin River watershed ATV trails that ATV enthusiasts are clamoring for. The Route 110 "option" would be a low-impact solution, of course. Fifteen minutes or so of riding between Groveton and West Milan villages on Route 110 would permit the ATV enthusiasts to realize the vast system they covet. And it would allow the Nash Stream Forest to remain the beautiful and quiet domain that it is and that the original Forest plan sought to establish and conserve for all time.

Submitted by:

Ken Vallery, president

Kim Nilsen, founder

Guinn, William

From: Mark Beaven <mgbeaven@mac.com>
Sent: Friday, March 03, 2017 2:10 PM
To: DRED: Nash Stream Plan
Subject: ATV USE IN THE NASH STREAM FOREST
Attachments: A Member of the Percy Summer Club Letter to DRED from Mark Beaven. 03.02.17.pdf; ATT00001.htm

Dear Director Simpkins,

I am writing to you as one of the seven (7) members of the Percy Summer Club of New Hampshire (PSCNH), which is located in the town of Stark, New Hampshire. I'm contacting you to voice a serious concern and opposition regarding to proposed increased use of ATV's in the Nash Stream Forest.

As background, our club was established in the early 1880's, with the purchase of some 370+ acres of land surrounding Lake Christine, as well as the lake and the brooks that provide the watershed to the Lake. For more than 130 years we have worked to preserve the scenery, forests and pristine nature of these surroundings. In the late 1980's the members of PSCNH, including former member and philanthropist, the late John M. Kauffmann, worked with the Society for the Protection of New Hampshire Forests to create an easement for our lands, in coordination with additional neighboring land owned by John M. Kauffmann and the adjacent Nash Stream Forest.

The seven historic family camps on the northwestern end of the Lake are all that constitutes our Club's minimal visible presence along this pristine shoreline, with the backdrop of the Percy Peaks, Victor Head and Bald Mountain behind us. Our families, friends, guests, and the thousands of people each year who come to enjoy the public beach on Lake Christine; fish, kayak, sail and canoe the lake; or hike the trails up Victor Head, and the Percy Peaks. Locations like this are rare and deserve care and protection.

In recent years the rise of ATV use has begun to impact this pristine nature of the Percy Summer Club and adjacent Nash Stream Forest. Unlike snowmobiles, which have the protective bed of snow and ice beneath their treads, ATV's have a much more significant and negative impact on the trails, forest and watershed. Additionally, and importantly, we now have a noise pollution issue that we've not had previously. When enjoying the region's fishing, hiking or other local offerings, instead of listening to the anticipated sounds of streams, brooks, winds blowing through the trees, birds and other natural sounds, people in the area are now also hearing ATV's resonate through the forests. Adding further trails and ATV access is not in the best interest of the Nash Stream Forest, and was certainly never anticipated or would have been considered agreeable when the Percy Summer Club coordinated with the Society for the Preservation of New Hampshire Forests for the creation of our easements.

Thank you for taking into account my family's objection as you consider the careful balance that needs to be maintained to protect the north country's very special unique and vulnerable Nash Stream Forest area.

Respectfully,

Mark G. Beaven, Trustee

Edgemere Trust

March 1, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

SUBJECT: ATV USE IN THE NASH STREAM FOREST

Dear Director Simpkins,

I am writing to you as one of the seven (7) members of the Percy Summer Club of New Hampshire (PSCNH), which is located in the town of Stark, New Hampshire. I'm contacting you to voice a serious concern and opposition regarding to proposed increased use of ATV's in the Nash Stream Forest.

As background, our club was established in the early 1880's, with the purchase of some 370+ acres of land surrounding Lake Christine, as well as the lake and the brooks that provide the watershed to the Lake. For more than 130 years we have worked to preserve the scenery, forests and pristine nature of these surroundings. In the late 1980's the members of PSCNH, including former member and philanthropist, the late John M. Kauffmann, worked with the Society for the Protection of New Hampshire Forests to create an easement for our lands, in coordination with additional neighboring land owned by John M. Kauffmann and the adjacent Nash Stream Forest.

The seven historic family camps on the northwestern end of the Lake are all that constitutes our Club's minimal visible presence along this pristine shoreline, with the backdrop of the Percy Peaks, Victor Head and Bald Mountain behind us. Our families, friends, guests, and the thousands of people each year who come to enjoy the public beach on Lake Christine; fish, kayak, sail and canoe the lake; or hike the trails up Victor Head, and the Percy Peaks. Locations like this are rare and deserve care and protection.

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winds blowing through the trees, birds and other natural sounds, people in the area are now also hearing ATV's resonate through the forests. Adding further trails and ATV access is not in the best interest of the Nash Stream Forest, and was certainly never anticipated or would have been considered agreeable when the Percy Summer Club coordinated with the Society for the Preservation of New Hampshire Forests for the creation of our easements.

Thank you for taking into account my family's objection as you consider the careful balance that needs to be maintained to protect the north country's very special unique and vulnerable Nash Stream Forest area.

Respectfully,

Mark G. Beaven, Trustee
Edgemere Trust

mgbeaven@mac.com
(203) 912-7437

Guinn, William

From: Diane Holmes <dholmes@ne.rr.com>
Sent: Friday, March 03, 2017 3:21 PM
To: DRED: Nash Stream Plan
Subject: Comments - 2017 Nash Stream Forest Draft Plan
Attachments: Nash Stream Comments 3-3-2017.docx

Please accept the attached word document concerning comments on the 2017 Nash Stream Forest Draft Plan.

Thank you,
Diane Holmes
Michael Pelchat
75 Lancaster Road
Gorham, NH 03581
603-466-2057

NH Division of Forests and Lands
Attention Nash Stream Plan
172 Pembroke Rd
Concord, NH 03301

Please accept and submit our comments for the Nash Stream Forest 2017 Draft Plan.

The 2017 Draft revision of the Nash Stream Forest Plan should be withdrawn as it does not appear to be in alignment with the intent of the original plan and its lack of inclusion from a representative public committee during revision changes.

The draft revision represents plan changes concerning resource management of NSF without providing monitoring data or other scientific documentation to provide evidence in support of recommended changes to the original plan. For example: the directive to establish “control areas” in the timber management zone to guide future management decisions appears to not have taken place and the introduction of OHRV’s without due public process and environmental study are not in accordance with the original plan.

The proposed draft appears to lack current thoughts and valid science on the threats posed by climate change. The NSF could be part of a solution to this worldwide trend by supporting and improving management practices that enhance the ability to sequester carbon while providing connected old growth forests that support a diverse natural habitat for native plant and animal species.

In evidence to the above comments the 1995 Management Vision stated: “Continue to offer public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas” ...and “non-consumptive uses” such as watchers of wildlife and birds, photographers, artists, and hikers.

In 2002 the 1995 Management Plan’s ban on ATVs was amended to allow limited ATV use on a trial basis in the NSF without adequate public comment or sound environmental study, and has yet to provide necessary ecological monitoring of the impacts from OHRV carbon emissions, **noise**, dust, land destruction, and wildlife and ecosystems disruption. The state is permitting an expansion of the OHRV network to include the Kelsey Notch Trail despite inadequate monitoring and does not have adequate funding for safety and enforcement of laws concerning this high impact activity that is not in line with the recreation permitted in the original plan.

We do not support the current draft plan. Thank you for the opportunity to provide comments.

Diane Holmes
Michael Pelchat
75 Lancaster Road
Gorham, NH 03581
603-466-2057

Guinn, William

From: fourneils@ne.rr.com
Sent: Friday, March 03, 2017 3:26 PM
To: DRED: Nash Stream Plan

As someone whose home life has been negatively affected by the opening of an OHRV connector trail behind our home and the opening of Route 2 to OHRV traffic in front of our home, I would proceed very slowly before making a decision to open more OHRV trails in the Nash Stream Forest. Before said trails were opened to OHRV traffic in our neighborhood, we enjoyed the presence of a peaceful existence in and outside our home. Now for six months of the year, from opening day in May through November, the peaceful enjoyment of our home has been taken away. The overbearing abusive noise from OHRV's becomes worse every year as the sport is quickly growing. We have to leave our home to find tranquility, and finding quiet places is becoming harder in this area as the sport of riding OHRV's grows. These machines are not built to be quiet, so the noise permeates through a large area.

I am not against OHRV's, but the peace and quiet of the Nash Stream Forest should be preserved for those who seek the tranquility of that area. The presence of more OHRV trails would just steal away that tranquility. Our home is proof that a peaceful existence cannot be balanced with the presence of the abusive noise of OHRV's.

Bruce & Nancy Neil
90 Lancaster Road
Gorham NH

Guinn, William

From: Rhodie Margesson <rmargesson@gmail.com>
Sent: Friday, March 03, 2017 3:53 PM
To: DRED: Nash Stream Plan
Subject: ATVs - Nash Stream Forest
Attachments: ATV opposition letter 030317 final.docx

Dear Mr. Simpkins,

Attached please find my letter regarding ATV use in the Nash Stream Forest.

At your convenience, please confirm receipt of this email.

With thanks.

Sincerely,

Rhoda Margesson

March 3, 2017

By email

Mr. Brad Simpkins
Director
NH Department of Resources and Economic Development

Dear Mr. Simpkins:

I am a camp owner on Christine Lake in Stark and a member of the Percy Summer Club of New Hampshire, an organization my great grandfather co-founded with four others in 1882. I strongly oppose additional ATV/OHRV trail expansion in the Nash Stream Forest.

As you know, in the 1980's the Club granted a conservation easement on its land surrounding Christine Lake to complement the State's purchase of Nash Stream and to augment protection of the watershed agreements. These conservation lands comprise the entire watershed of Christine Lake, which experts now view as the closest thing to a wilderness lake in the State of New Hampshire. Sensitive natural areas and wildlife are protected, while property owners, local communities, and the general public increasingly experience the beauty of this place through quiet enjoyment of recreational use, such as hiking and kayaking.

The use of ATVs stands in conflict with the good faith intent of the Club in granting a conservation easement on its land. Furthermore, ATVs were not included in the original 1995 management plan because they are incompatible with the recreational and protection priorities outlined above and envisioned in this landmark undertaking. While a pilot trail on the West Side Road was allowed in 2002 and a second trail to the north was permitted more recently, this was agreed in the spirit of compromise. Many of us would argue it already goes too far, and it is disheartening to learn that ATV users now want even more.

I understand there are different views on recreational use, and ATVs are popular. However, in the state of New Hampshire, ATV users already have many existing trail systems and options for future trail planning. Christine Lake and its forested watershed are unique. Outside of the White Mountain National Forest, this is likely the largest remaining watershed of its type, and it is a State treasure. It should not be compromised under pressure for further development of ATV trails. Unlike ATV users, we do not have options to find something similar elsewhere because it simply does not exist.

Christine Lake and the lands surrounding it have remained virtually unchanged since my great grandfather first came here. Further ATV/OHRV trail expansion in the Nash Stream Forest would have a significant, negative impact not only for us as camp owners, but for the local community, for those who come in search of unspoiled natural surroundings, and for the greater good of generations to come. We have a responsibility to see that the inspired vision behind the conservation and protection efforts for Christine Lake and its forested watershed continue to be realized even as pressures rise for alternate use. I implore you to please hold firm against this measure.

Sincerely,

Rhoda Margesson

Guinn, William

From: Bill Felling <bill_felling@jsi.com>
Sent: Friday, March 03, 2017 3:48 PM
To: DRED: Nash Stream Plan
Subject: Comments on the Nash Stream Plan
Attachments: NashStreamLetter-20170303.pdf

see attached. Thank you for your attention to this important matter.

Bill Felling

321 Summer Club Rd
Stark, NH 03582
March 3, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
172 Pembroke Road
Concord, NH 03301
(via email: nashstreamplan@dred.nh.gov)

Re: Nash Stream Plan

Although it was nearly 30 years ago, I can still recall the extensive discussion that took place at the Percy Summer Club regarding the Nash Stream Forest and the idea of a conservation easement on both the Club's land surrounding Christine Lake and the state-owned land which makes up much of the viewshed. The intent at the time was clearly to maintain the lake and surrounding lands in as natural a state as possible, preserving what was even then a uniquely undeveloped area for the quiet enjoyment of future generations.

The fact that the State of New Hampshire, the US Forest Service, the Society for the Protection of New Hampshire Forests and the Percy Summer Club all worked together to achieve this goal speaks volumes about the importance of the vision to everyone involved.

I do not believe that permitting additional OHRV/ATV use within the Nash Stream Forest is consistent with this vision. As the current draft management plan notes, "Since the inception of the property, the recreational focus has been on traditional low-impact uses." While ATV use has become an increasingly popular activity in the years since the original management plan was enacted, it is not a traditional use. In the last twenty years Christine Lake and the surrounding forest have seen increasing use by hikers, kayakers, canoeists and others who value the quiet enjoyment which it currently provides and which is increasingly difficult to find – and which is inconsistent with increased ATV use.

Nor is it low-impact. Increasing ATV use poses a very real threat to streams, wetlands, other sensitive natural areas and wildlife, all of which are under increasing threat from climate change and other "natural" forces, and which are critical to the continued health of the forest.

For these reasons I urge you to prohibit any expansion of ATV/UTV use within the Nash Stream Forest.

Sincerely



William D. Felling

Guinn, William

From: Scott M. Watson <smw.scott@starpower.net>
Sent: Friday, March 03, 2017 4:03 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Use
Attachments: Simpkins Letter 3.3.17.pdf

Dear Director Simpkins,

Please find attached a letter in opposition to creation of new ATV trails in the Nash Stream State Forest. I respectfully request that you take my heart-felt and experience-based views into consideration with those of others voicing their opinions on this topic. The beauty, tranquility and environmental integrity of New Hampshire's forests are sacred and must be preserved.

Sincerely yours,

Scott M. Watson
610 687-6677
(mobile) 202 213-6677
smw.scott@starpower.net

SCOTT M. WATSON
6107 WEST MILL ROAD
FLOURTOWN, PENNSYLVANIA 19031
PHONE: 610 687-6677

March 3, 2017

Mr. Brand Simpkins, Director
NH Department of resources and Economic Development
Division of Forests and Lands
Attn: Nash Stream Plan
172 Pembroke Rd.
Concord, NH 03301

Dear Director Simpkins,

I am writing because I have become aware of an effort by some to expand the range of ATV trails into areas of remote forests in northern New Hampshire that have been kept free of them.

I am not a year-round New Hampshire resident, but my son has settled in New Hampshire and is raising a family there. I, and he after me, had our personalities shaped during childhood by the beauty and peacefulness of the pristine lakes and woods in northern New Hampshire. Over the years, we have watched as some of our favorite hiking trails have been degraded significantly because of use by ATVs and snow-mobiles. In addition to the noise and pollution that these vehicles spread, they leave their mark permanently by tearing up the surface of long-used, once-sturdy, and formerly beautiful trails. Opening remote areas to users of these vehicles increases the incidence of trash being left in the woods and of destruction of delicate foliage, as well as interfering with the important ecosystems of once-serene animal habitats.

I would like to share a personal experience that will always color my view of ATV interlopers.

I have had the privilege to stay for over 40 summers at a friend's quiet, remote camp near Groveton, NH. One of the most pleasant features of the camp was an old cabin, high on a hill, with a lovely lake view. This cabin was accessible by a very bumpy, rocky, dirt road, but we mostly walked up there, following a beautiful trail by a picturesque brook. At the end of our hike, we would sit on the porch of the cabin and enjoy lunch or supper, and sometimes we would spend the night there before heading down to our camps on the lake shore.

The cabin was always left unlocked in the winter, and we stocked it with provisions for the occasional hunter or hiker who might come along and need shelter. The log book was filled with many years' worth of anecdotes and thanks, penned by those who would use the cabin as a refuge in a storm during the fall, winter, and spring, and we always enjoyed reading these log entries when we would return for the summer. These people would always leave the cabin clean and orderly, and often they would leave provisions for the next folks who might happen to come by and need them.

Then came the snow-mobile and the ATV. I remember two summers in a row, several years ago, when we had to spend the entire first week replacing every pane of glass in the windows, fixing lovely old chairs and other furniture that had been smashed to bits, and removing viciously profane graffiti from the walls and log book. It was heart-breaking to see how some folks would treat other people's property, after so many years of looking forward to reading the log entries of grateful users. The third year that this happened, we decided very reluctantly that having the cabin wasn't worth the pain of seeing this every year, and we took down what was left of it after the previous winter's vicious human destruction. What remains of our charming, woodland hide-away is the sad realization of what can happen when remote areas are opened to recreational vehicles.

I hope you will do all in your power to contain them, and NOT to extend their range into the remaining, serene woods in your beautiful state. The area around Nash Stream and the Percy Peaks is gorgeous and mostly unspoiled. I hope you will not allow it to be trashed by careless users of ATVs and snow-mobiles.

Sincerely,

Scott M. Watson, IALD
Flourtown, PA

Guinn, William

From: Jim OBrien <jim_obrien@tnc.org>
Sent: Friday, March 03, 2017 4:24 PM
To: DRED: Nash Stream Plan
Cc: Simpkins, Brad
Subject: Nash Stream Comments
Attachments: March 3 -Nash Stream Public Comments - TNC - Final.pdf

Good afternoon -

Please find attached comments on the Nash Stream Management Plan from The Nature Conservancy in New Hampshire.

We appreciate your time and commitment to our state's natural resources.

Please let me know if you have any questions.

Jim

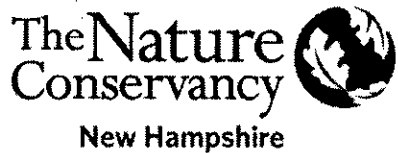
Jim O'Brien
Director of External Affairs
@jim_obrienNH
(603) 224-5853 Ext. 28 (Phone)
(603) 856-5378 (Mobile)
(603) 228-2459 (Fax)

The Nature Conservancy
New Hampshire
22 Bridge Street
4th Floor
Concord, NH 03301
nature.org

**The Nature
Conservancy**
Protecting nature. Preser

jim_obrien@tnc.org

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March 3, 2017

Director Brad Simpkins
Division of Forests and Lands
Department of Resources and Economic Development
172 Pembroke Road
Concord, NH 03301

RE: The Nature Conservancy of New Hampshire's Comments on the 2017 Draft Nash Stream Forest Management Plan

Dear Director Simpkins,

Thank you for the opportunity to provide written comments on the draft Nash Stream Forest Management Plan. The Nature Conservancy would like to acknowledge the tremendous amount of time and effort that you and the staff at Forest and Lands spent on the Management Plan revision. We appreciate the time spent with the Council on Resources and Development, the public hearings, engagement with the Citizen's Advisory Committee, as well as this opportunity to provide feedback on your proposal.

Upon detailed review of the draft 2017 Nash Stream Forest Management Plan, The Nature Conservancy finds that:

- 1) The draft Management Plan makes substantive and fundamental changes to the Management Vision and Principles section of the Plan. We believe that the forest will be better served by retaining fully the language of the 1995 Vision and Management Principles section.
- 2) There is a considerable lack of recent, good quality field data to base management decisions on. Some datasets, such as the timber cruise and information on rare species and exemplary natural communities, date to the State's acquisition of the property and are now nearly 30 years old. In addition, important data needed to support an adaptive management cycle, such as the data that was intended to be generated as part of the Control Areas included in the 1995 plan, has never been collected. Given the significant conservation values of Nash Stream, and its place as New Hampshire's premier State Forest, it's critical that resources are directed at correcting these information gaps. We recognize that this lack of data stems from the fact that the state agencies tasked with managing Nash Stream Forest are severely underfunded, rather than any lack of recognition of the importance of collecting these data on the part of our state agency partners. Nevertheless, the 2017 draft Management Plan would make significant changes to the management of forest resources without the benefit of quality field data.

- 3) The 1995 Plan included a set of management guidelines for natural preserves on pages 117 and 118; no similar guidelines appear to have been included in the revised draft. We strongly recommend that these guidelines be reinstated so the plan is clear about how the natural areas will be managed, and what types of use will and will not be permitted.
- 4) The recommended riparian buffer width of 25-50' along perennial streams in the Nash Stream Forest based on Good Forestry in the Granite State is insufficient to protect the integrity of the high quality cold-water aquatic habitat and associated brook trout fishery. We propose a minimum unharvested buffer width of 100'.
- 5) The plan includes a notable shift in silvicultural emphasis from uneven-aged to even-aged management, and a management direction that may result in as much as half of the commercial forest area in young forest. Taking into consideration the landscape surrounding Nash Stream, which includes an abundance of young even-aged forest, and established best practices for increasing climate resilience, we believe the emphasis of the 1995 Plan on long-rotation uneven-aged management should be restored. At a minimum, the forest structure goals should be changed to include at-least 10-15% in large sawtimber/old forest. The old forest characteristics and biological legacies that will be developed and retained in these areas are a foundation of ecologically-focused forestry, will help to conserve biodiversity, and will play an important role in making Nash Stream more resilient to climate change.
- 6) The 2017 Management Plan should prohibit any expansion of ATV/UTV trails on the property. Only the established West Side Trail should be identified as a permanent trail. The Kelsey Notch Trail should be clearly identified as a Pilot Trail following the criteria set forth by the Council of Resources and Development (CORD) in their December 8, 2016 decision. Further, the 2017 Management Plan should be further amended to incorporate the General Findings for ATV/UTV use within Nash Stream Forest contained in the same December 8th CORD decision.

The Nature Conservancy's Interest in Nash Stream

In 1988, the state's Land Conservation Investment Program (LCIP) approved a grant of \$7.65 million in state funding for the purchase of more than 40,000 acres of land, including the self-contained Nash Stream watershed (totaling 39,503 acres in the towns of Stark, Odell, Stratford and Columbia). At the same time, The Nature Conservancy (TNC) and the Society for the Protection of New Hampshire Forests (SPNHF) jointly guaranteed a loan of \$5.1 million to bridge the difference between the LCIP grant and the full purchase price of the Nash Stream watershed.

A closing took place on October 27, 1988 where the State of NH purchased 46,679 acres for \$12.75 million and re-conveyed 4,496 acres to the Forest Service for \$1.175 million. The Forest Service also agreed in principle to share the costs of the Nash Stream acquisition through the purchase of a Conservation Easement on the property. As the terms of the easement were being negotiated, SPNHF and TNC loaned the state \$3.925 million to provide the balance of the purchase price.

Finally, on August 4, 1989, the Conservation Easement on Nash Stream was sold to the United States of America for \$3.95 million and the TNC/SPNHF loan was repaid with appropriate interest. Today, Nash Stream Forest is NH's largest single state forest.

The Nature Conservancy were advocates at the time for state acquisition of the Nash Stream State Forest, and have since been actively engaged in collaborative efforts – including serving on the Nash Stream Citizens Advisory Committee - to manage the land for the benefit of the citizens of the State.

1995 Management Plan and Original Vision

The Nature Conservancy and partner organizations assisted the state of New Hampshire with funding at a critical moment in the acquisition of the Nash Stream Forest, and helped develop the first Management Plan completed in 1995.

This Management Plan was crafted by a broad range of groups- conservation organizations, government agencies, recreation groups, camp owners, forest products officials, and most importantly the general public. This coalition of stakeholders which included The Nature Conservancy, was formed as an appointed committee by the governor as a focused source of input and expertise. This five-year planning process culminated in late 1995 with the adoption of the Nash Stream Management Plan. DRED was charged with implementing the management plan based on input received from the advisory committee.

The foundation of the 1995 Management Plan lies in the Management Vision and Principles section. The Management Vision and Principles spell out the guidelines and goals of the Management Plan and states that "The management of Nash Stream Forest will be a model of environmentally sound public land stewardship." The Plan further states that the plan will strive to "protect the natural qualities of the land, natural communities, native species and ecological processes."

As developed, the Vision for the Nash Stream Forest was that it would be managed differently than much of the existing state forest land. That is, a combination of working forest lands and natural areas where ecological processes would be allowed to continue unchecked, and would be managed in concert to protect the integrity of the natural landscape. The authors of the 1995 Management Plan summed up this management vision well: "We envision Nash Stream will be managed as a blend of a relatively undisturbed forest ecosystem, and a working forest producing high quality forest products." This is the first and only state forest where this is stated as a goal of the management plan. While ecologically based forestry and traditional recreation would continue, the primary goal, according to the Management Plan would be to "manage the land with as little interference as possible with natural functions."

2002 Amendments to Management Plan

Three major issues were identified and addressed as part of the 2002 Management Plan Updates and Revisions. 1) Lifting the prohibition on recreational use of all-terrain vehicles (ATV's), 2) changing the private camp lot license policy, and 3) establishing a specified Plan revision schedule.

The most significant change by far in the 2002 plan was to allow limited ATV use within the Nash Stream Forest. ATV use was not considered a traditional use, and the 1995 Management Plan specifically prohibited ATV's on the property.

HB 1273¹ signed into law in May 2002 provided that the department should move forward with the planning and approval process for an appropriate ATV connecting trail in the Nash Stream Forest, in

¹ <http://www.gencourt.state.nh.us/legislation/2002/HB1273.html>

cooperation with a local ATV club. This charge was reflected in the 2002 amendment with the decision to establish a pilot ATV trail and related environmental monitoring for a "West Side Connector Trail." The 2002 Amendments to the Management Plan provide that the Commissioner of DRED had the final authority to either make the pilot West Side Connector Trail permanent, or discontinue its use. On March 21, 2007, then-Commissioner George Bald issued a letter adopting the trail as permanent.

While the 2002 amendment allowed for the establishment of the West Side Trail, the language is also quite clear that **"No other roads of trails are open to ATVs on the property."**

Several minor changes were made to the Management Vision and Management Principles section of the Nash Stream Forest Management Plan to accommodate the change in ATV use policy. Changes made to the 1995 language is highlighted below:

Management Vision: Continue to offer public access for traditional, low impact, dispersed recreation including hunting, fishing, hiking, and snowmobiling in designated areas; **as well as offer other limited motorized access.**

Management Principles: Recreation management of the Nash Stream Forest will provide low impact, ~~dispersed~~, and traditional opportunities **as well as limited motorized access to provide opportunities for all forest users.** Management decisions will be consistent with the guiding philosophy of protecting the environmental integrity of the land.

- A. Recreational opportunities will include hunting, trapping, fishing, hiking, camping, snowmobiling, **and other limited motorized access on designated and properly maintained roads and trails.**

The 2002 Amendments also included a 10-year Plan revision schedule, changing the 1995 Plans 'as needed' process. According to DRED, this change "will provide clear guidance for addressing future issues should they emerge." Unfortunately, additional significant ATV Trail development and use was advanced by the department outside the Management Plan revision process in violation of the existing Management Plan.

2012 Kelsey Notch Pilot Trail

According to a letter dated July 6, 2016 from DRED Commissioner Jeffrey Rose to The NH Council of Resources and Development (CORD) Chair Amanda Merrill², "The Kelsey Notch Trail opened for use in May, after the April 2013 CORD meeting." There had been a 6-month process from when the concept was first discussed at the November 12, 2012 Nash Stream Committee meeting to the trail being open for ATV use.

The Kelsey Notch Pilot Trail was established outside the Nash Stream Management Plan revision process identified in the 2002 amendment. The opening of the Kelsey Notch Trail violates the provision included

² <https://www.nh.gov/oep/planning/programs/cord/documents/nash-stream-7-6-16-dred-letter.pdf>

in the 2002 Management Plan amendment which identifies only the West Side Connector as a Pilot Trail, and states that "no other roads or trails are open to ATV's on the property."

2016 Council on Resources and Economic Development (CORD)

On May 5, 2016, The Nature Conservancy, The Appalachian Mountain Club and The Society for the Protection of New Hampshire Forests sent a letter³ to CORD expressing "deep concern about the legal status of the two existing trails in Nash Stream State Forest." Of primary concern to TNC was that DRED did not follow existing state statute when establishing the ATV trails on the Nash Stream property. Specifically, RSA 215-A:42⁴ sets out specific criteria that must be met before any ATV trails are established on state owned lands. In regards to the Kelsey Notch Trail in particular, there was no provision in the existing Management Plan allowing for its establishment as is required by the RSA. The organizations asked CORD to determine whether the existing ATV trail system is in compliance with state law, and if not, to take appropriate action.

At their December 8, 2016⁵ meeting, CORD made several important decisions regarding appropriate ATV use in Nash Stream. In a letter dated December 14th, CORD outlined the decisions made on December 8th with general findings for any ATV use in the Nash Stream Forest, and how the Kelsey Notch trail should be managed moving forward. In the same document, CORD also responded to DRED's request for guidance on three ATV trail options for potential inclusion in the 2017 revision of the Nash Stream Management Plan.

General Findings:

In response to the concerns expressed from TNC, AMC and SPNHF about the establishment of the two existing ATV trails, the Council adopted general findings governing ATV use in the Nash Stream Forest:

The Council finds that in order to perform its statutory duty to manage LCIP lands, members must review and find that any use of ATV/UTVs, as currently defined by statute, within Nash Stream Forest is consistent with the principles set forth in RSA 162-C:6 prior to implementation.

CORD further finds that any ATV/UTV use in Nash Stream Forest must be limited to specific ATV/UTV trails approved by CORD in advance. In order to be consistent with the principles set forth in RSA 162-C:6, CORD finds that each proposed ATV/UTV trail must meet the following conditions: (1) the trail must be designed, sited, and used so that it preserves and does not adversely impact natural resources and conservation attributes of the property and does not interfere with or detract from the other uses of Nash Stream Forest; (2) the trail must be authorized in a current management plan, which has been reviewed by CORD for consistency with RSA 162-C:6 and has had appropriate public and state agency input; (3) the trail must comply with the requirements of RSA 215-A and all other applicable ATV/UTV and

³ <https://www.nh.gov/oep/planning/programs/cord/documents/nash-stream-5-5-16-amc-spnhf-tnc-letter.pdf>

⁴ <http://www.gencourt.state.nh.us/rsa/html/XVIII/215-A/215-A-42.htm>

⁵ <https://www.nh.gov/oep/planning/programs/cord/documents/nash-stream-findings.pdf>

environmental regulations and standards, and the state's most recently adopted best management practices for trail construction and erosion control; (4) after construction, the trail must be continually managed to protect natural resources and conservation attributes and to limit interference with other uses of Nash Stream Forest; (5) CORD must be adequately informed on an ongoing basis of the status of management, maintenance, and enforcement efforts related to ATV/UTV use, as well as impacts of ATV/UTV trails on the Nash Stream Forest; and (6) CORD reserves the right to periodically reassess whether ATV/UTV use in the Nash Stream Forest, or any of the trails therein, remains consistent with RSA 162-C:6 and reserves the right to temporarily or permanently close trails if necessary as circumstances change over time.

Kelsey Notch Trail

In their December 14th letter, CORD addressed how the department should move forward with the management and administration of the Kelsey Notch Trail, which was not included in the 1995 or the 2002 Management Plan.

The Council finds that, based on current available information, it is not able to determine at this time whether continued use of ATV/UTVs on the Kelsey Notch Trail is consistent with CORD's management obligations under RSA 162-C:6. In order to assist in this determination, CORD requests the following additional information regarding the use, maintenance, and impacts of ATV/UTVs at this location.

- 1) *By the January 12, 2017 CORD meeting, DRED shall submit to CORD for review the following:*
 - a. *An updated coarse and fine filter analysis of the Kelsey Notch Trail, pursuant to RSA 215-A:43;*
 - b. *An interagency memorandum of understanding, pursuant to RSA 215-A:42; and*
 - c. *Written agreement between DRED and a local ATV/UTV club, pursuant to RSA 215-A:42.*
- 2) *At such time that CORD has reviewed the information above and determined that it is sufficient for the Kelsey Notch Trail to provisionally re-open for ATV/UTV use, DRED shall then submit the following to CORD for review as they become available:*
 - a. *The annual reports required pursuant to the interagency memorandum of understanding; and*
 - b. *Such additional reasonable and appropriate studies, data, and information as CORD may require to adequately assess whether the continued use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6.*
- 3) *CORD will assess this additional information for three years (Beginning in 2017) and at the end of this time period, or at any time as circumstances dictate, CORD shall determine, based on available information:*
 - a. *That additional information and assessment is necessary to determine whether the use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6; or*
 - b. *That use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6, subject to the general conditions for any ATV/UTV use in Nash Stream Forest; or*
 - c. *That ATV/UTV use on the Kelsey Notch Trail is not consistent with RSA 162-C:6 and the trail shall cease to be open for ATV/UTV use.*
- 4) *During the pendency of CORD's review of the Kelsey Notch Trail no expansion of the area of disturbance for ATV/UTV use shall be permitted without prior CORD approval.*

Guidance on Management Plan

In a document titled *Nash Stream Forest OHRV Briefing Paper*⁷, DRED sought “advise and consultation” from CORD prior to moving forward with a revised Management Plan. DRED asked that CORD look at all the potential options for ATV/UTV use in Nash Stream together and determine if one or all of them would be consistent with the LCIP funding that helped acquire Nash Stream. The three options that DRED asked CORD to consider were:

Option 1: Status Quo

- No new OHRV trails within Nash Stream.
- Continue the Kelsey Notch Pilot Trail.
- Continue to allow the West Side Trail.

Option 2: Keep OHRV use consistent with the 2002 Plan amendment.

- No OHRV beyond the West Side Trail.
- Eliminate the Kelsey Notch (pilot) Trail.

Option 3: Expansion of the OHRV trail system

- Create an east/ West Corridor Trail in the southern portion of Nash Stream.
- Continue to allow West Side Trail.
- Adopt the Kelsey Notch Pilot Trail as a designated ATV trail – Kelsey Notch Trail.
- Allow a southern connector from the existing West Side Trail down to services and connection to the new east/west corridor.

These three options were presented to CORD and discussed in public session. In its December 14th letter to DRED, CORD provided the following guidance on these three options to assist the department in the development of the 2017 Management Plan:

*In looking at the three options presented to CORD from DRED, and given the preliminary findings of the Technical Team, **Option 3 would not be consistent with both the management vision as well as RSA 162-C:6.** Both Option 1, keeping the status quo, and Option 2, keeping OHRV use consistent with the 2002 Management Plan amendment, would be consistent with both the management vision and CORD’s LCIP responsibilities. However, Option 1 needs to reflect CORD’s determination earlier in today’s meeting.*

Conclusion

In the year or so preceding the release of the draft 2017 Nash Stream Management Plan, there had been a lot of conversation and information shared regarding the establishment and management of the existing ATV/UTV trail infrastructure in Nash Stream Forest, and about potential expansion of ATV/UTV’s on the property.

The Council on Resources and Development (CORD) has a statutory obligation to ensure the proper management of Nash Stream Forest under 162-C:6. Following their deliberations on the subject of ATV/UTV use on the property, on December 8th CORD issued general findings which clarify how trails are

⁷ <https://www.nhdf.org/library/pdf/Nash%20Stream%20Forest/ATV%20Briefing%20bws%2010-25-16.pdf>

established and maintained on the property. As a key piece of the management of the property, these guidelines should be incorporated into the language of the draft 2017 Management Plan. In addition, CORD has determined that the Kelsey Notch Trail shall be considered a Pilot Trail for three years (beginning in 2017) and subject to further review. Finally, CORD determined that a plan to expand the ATV/UTV trail system at Nash Stream, including a proposed Southern Connector trail, would not be consistent with both the management vision for the property as well as RSA 162-C:6. TNC believes that the draft Management Plan should reflect these decisions, and that the inclusion of the Southern Connector be eliminated from consideration.

2017 Nash Stream Forest Management Plan Revision

Nature Conservancy conservation staff conducted a detailed chapter by chapter review of the draft management plan and offer general comments and observations, as well as specific line edits intended to improve the plan and the conservation of the valuable natural resources of Nash Stream Forest.

Chapter 1 - The Nash Stream State Forest

This Chapter provides important historical context regarding the property and the original conservation transaction. As time passes, it becomes even more important to retain the historical foundation for the conservation of this property. The Nature Conservancy is pleased to see that this section generally tracks the original 1995 Management Plan, with appropriate changes made to reflect activities that have occurred since that plan was developed. Our comments and recommendations focus on including the appropriate statutes governing ATV use on the property, and retaining the original public comment Highlights summary and Appendices.

Recommendations:

- **Section 1.6: Laws Affecting the Nash Stream Forest**
The statutes covering ATV use on state lands is not on the list of state laws affecting Nash Stream. Reference should be made to RSA 215: A 42 and 43, as well as any additional relevant OHRV statutes.
- **Section 1.7 Chronology/Planning process for Initial Management Plan**
Both the Highlights (at the beginning of the 1995 Management Plan) and reference to Appendices 2 & 3, (pages 159-160 of the 1995 Management Plan) have been removed. The summary included in the draft 2017 Management Plan is a simplistic characterization of the public comment history and does not represent the full breadth of comments received in the original process (such as: protecting natural area, passive recreation, minimum impact use and care to prevent over-use, no new roads/trails, concern about access to wildlife, ecological health). We think it important to retain both the Highlights as well as the original Appendices 2 & 3 at the end of the document (with references to those Appendices in Section 1.7) as they serve as a good historical record of the 120 people that attended.

Chapter 2 – Management Vision & Principles

The Management Vision & Principles established in the 1995 Management Plan reflect the deliberative, careful, inclusive thinking of many dedicated stakeholders working collaboratively and diligently over an extended period of time. As stated in the 1995 Plan, Nash Stream Forest was envisioned as “state-of-the-art” and “a model of public land stewardship.” The original Vision & Principles chapter was foundational to how the long-term management of Nash Stream State Forest was to take place. While the State does a commendable job in its forest management on its properties, Nash Stream State Forest was meant to be managed in a way that exceeded general forest management practices.

In January 2016, Charlie Bridges (NH Fish and Game), Will Abbott (Society for the Protection of NH Forests), Tom Miner (DRED), and Krista Helmboldt (The Nature Conservancy) - members of the original

Advisory Committee and Technical Team - were invited to attend a Nash Stream Technical Team meeting to provide historical perspective on topics related to the 2017 Management Plan Revision. These concepts of "timeless" and "foundational" intent were emphasized⁸, and discussions focused on a firm belief that the 1995 Vision allows for flexibility and need not be changed to accommodate sound forest management practices.

The Nature Conservancy feels it is important to note that the original 1995 Management Plan drafters were fully aware that the forest would mature and grow over time: the emphasis on long-rotation uneven-aged management in the original 1995 Management Plan was not a short-term vision for a forest which had so recently been very heavily cut and needed time to mature; rather it was a long-term vision for long-rotation uneven-aged management on an ongoing basis with high quality solid wood products; it reflected a strong commitment to the emerging concepts of ecological forestry. Nash Stream was meant to be a model of this approach.

While we are fully aware that advances in our understanding of ecological forest management practices and new information may indicate the need for adaptations to the management goals and objectives (as guided on p. 135 of the 1995 Management Plan), those decisions should be made on sound science and remain true to the original vision. The passage of time and the growth of the forest are not appropriate justifications for the notable shift in emphasis from uneven-aged management to even-aged management in the 2017 draft Management Plan. While we comment more on specific forest management in our comments for Chapter 8, we feel it is important to address it in the context of these foundational Management Vision & Principles.

The Nature Conservancy is concerned about the substantive changes made to the Management Vision & Principles in the 2017 Revision:

- The Vision is meant to provide a timeless foundation; our concern is that once the Vision is changed, it opens the door to significant and foundational changes over time, which can lead to a substantive erosion or migration away from original foundational principles.
- Specifically, with the exception of the appropriate addition of "and water" to the final Vision bullet, we see the suggested changes as individually and cumulatively shifting and eroding how forest management should occur, ecological processes be maintained, and allowances for low-impact dispersed recreation. We are concerned about the impact of these decisions as they stray significantly from the acquisition intent and original Vision and threaten to unravel the intentions thought to be secured by original stakeholders; they also threaten the investments of stakeholders.

Recommendations:

- Management Vision 1st Bullet contains unacceptable changes (see a redline version of the proposed changes below). The removal of "*as little interference as possible with*" substantively alters the intent and vision to be applied to the management of Nash Stream State Forest. This Vision bullet as

⁸ P. 135 of the 1995 Management Plan, "Monitoring & Evaluation": "The Management Vision is considered a timeless document but nonetheless a dynamic one, subject to change should the management direction it provides be considered inappropriateThe Process of changing either the Vision or the Management Plan would be as involved as that which created them. It is anticipated that public comments and/or an advisory committee would be required to consider new information, including changing conditions and trends. Monitoring should provide the necessary means to help identify and document the need for change in management practices."

originally written was foundational and over-arching to the long-term vision of the Forest; it was central to the model of ecologically managed forestry that would occur on this property. The proposed changes weaken that Vision to an extent that is inconsistent with the founding Vision.

Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes. Use and build upon, rather than work in opposition to, ecological principles and natural tendencies. Manage the land in concert with ~~as little interference as possible with~~ the natural ecological functions.

- The changes to Management Principle C seem unwarranted and seem to be word-smithing, which may have unintended consequences. We want to see the language "continuity of natural areas" retained from the 1995 version.
- We do not support the changes to Management Principle D as they weaken the language on several fronts:
 - 1) We should retain "will minimize" rather than "strive to minimize,"
 - 2) Fragmentation should stand on its own without the addition of "forest" as a modifier; all fragmentation should be minimized.
 - 3) The examples of fragmenting activities are an important reminder for managers and the public to keep in mind; these should not be removed.
- We do not support the changes to Management Principle E as they shift the emphasis of the original Vision. The 1995 Management Plan language should remain intact: "*Recreation management will feature the natural beauty of Nash Stream Forest and fit naturally, with minimal development, on the landscape.*" The changes in the draft Plan are substantive and weakening of the original Vision:
 - 1) The original emphasis was intentionally on featuring the natural beauty.
 - 2) "... fit naturally on the landscape" and "with minimal development" were important dimensions of this vision and provide important ongoing guidance.
 - 3) The addition of primary focus coupled with a "broad range of opportunities" radically opens the door to things beyond what was part of the Vision in 1995. **A broad range of opportunities was not the vision. *Dispersed, low-impact recreation and traditional uses was the vision.***
- The changes to Management Principle F to allow for use of herbicides as scientifically warranted seems appropriate.
- We do not support the changes to Management Principle G as they remove useful and important descriptors of all the values being protected as a purpose of the buffers; the proposed changes seem to overly simplify this language and remove cues and standards which managers and decision makers should be considering as they evaluate activity near water bodies.

Chapter 4 - The Resource History of Nash Stream

The language used in the plan to describe the Natural Areas is not always consistent, and can result in confusion. We suggest defining the terms at the start of Section 4.2.3, including a table that clearly shows

what kind of management is permitted in each category, and then making sure that these terms are used consistently throughout the document. As an example, the last sentence of the first paragraph in Section 4.2.3 reads that "timber harvesting does not occur in areas designated as Natural Areas." If "Natural Areas" is a comprehensive term meant to include "natural preserves," "natural preserve buffer," "corridor," etc. than the statement is inaccurate. The plan permits limited timber harvesting in buffers and corridors, as described on Page 94. It appears that "core natural areas" and "natural preserves" are often used interchangeably. Furthermore, the plan would benefit from a table showing which of the natural area categories, and how much of each, are required by the terms of the conservation easement; as opposed to areas that have been designated for other reasons.

We suggest moving section 4.2.4 Invasive Plant Species to Chapter 9 Forest Protection. We believe that the threat of invasive plants is best addressed as part of a comprehensive approach that includes forest pests and pathogens, which are covered in Chapter 9. With invasive plants moved to Chapter 9, we recommend renaming Chapter 4 "Rare Species, Exemplary Natural Communities, and Natural Areas," which will help to provide additional focus on these critical resources found at Nash Stream.

We are pleased to see that the revised draft addresses the fact that much of the data at Nash Stream State Forest for rare species and exemplary natural communities is in excess of 25 years old. We strongly support and encourage the Division of Forest and Lands to utilize its Natural Heritage Bureau to update and augment this data, as outlined in Objective 1 under Section 4.3, in the next five years. Data for exemplary natural communities and rare species should not be nearly three decades old on the State's flagship forest.

Objective 4 under Section 4.3 states the following:

The FMB is planning to establish a network of permanent plots on NSF to gather information on inventory, growth, and yield in managed forests (see Chapter 8). Pending staffing and adequate funding, NHB plans to collaborate with the FMB to use this network of plots to gather natural community data. NHB will then expand this plot network into designated natural areas to allow for long-term examination of the differences in forest structure and composition between managed and unmanaged forests. This data could also identify potential impacts of climate change on forest composition and structure over long time periods."

While we enthusiastically support the establishment of long-term study plots at Nash Stream, it is unclear how data from plots established in the commercial forest area could be compared to plots established in the natural areas. The two zones are comprised of different natural community types and soils. The commercial forest area occupies the lower elevations and nearly all of the productive forest soils (Group 1 Forest Soils), while the natural areas are primarily high elevation forests, steep slopes, and less productive forest soils (Group 2 forest soils). Long-term study plots that are established to compare active and passive management approaches will need to be stratified such that they are comparing similar vegetation communities and physiographic settings.

We also support the intent, outlined in Objective 6 under Section 4.3, to evaluate the extent of the natural areas for the purposes of understanding how well they are protecting the biodiversity at Nash Stream. We believe the importance of this objective has been elevated by the removal of the Control Areas from the revised draft. The intent of the Control Areas was twofold, as described on Page 78 of the 1995 plan:

1. "The areas can be used to contrast changes in vegetational composition and structure [between] control areas [and] areas in which active management is occurring;" and 2. "An additional purpose for establishing control areas is the preservation of plant and wildlife habitat, including examples of natural community types not represented in natural preserves..." We believe it's important that Objective 6 explicitly state that changes to the natural areas will only be done during a forest management plan revision process.

On Page 33 of the 2017 Draft Management Plan, it states that "the system of core natural areas includes representatives of *the full range of ecological communities* [emphasis added] within Nash Stream Forest, as well as natural preserve areas containing rare, threatened, and endangered species." It is unclear if the core natural areas at Nash Stream currently capture the full range of ecological communities. If the "core natural areas" are the 8,113 acres also referred to as "natural preserves" they almost certainly do not. Even the eight categories of natural areas in Table 2 are unlikely to capture the full range of ecological communities; the criteria used to designate them dictates that this would be unlikely. The most productive forest soils and lower elevation forests, which are primarily northern hardwood forests, are almost entirely within the commercial forest area. The table below shows the current breakdown of Group 1 and Group 2 Forest Soils by management zones; 97% of the Group 1 Forest Soils are within the commercial forest area. Natural communities and ecological systems associated with these forest types are therefore unlikely to be captured in the natural areas.

Forest Soil Type	Natural Areas	Working Forest	Grand Total	% in Natural Area	% in Working Forest
Group I	706.20	20,538.00	21,244.20	3.32%	96.68%
Group II	17,115.10	15.56	17,130.66	99.91%	0.09%
Not Categorized	222.24	482.85	705.09	31.52%	68.48%

The 1995 Management Plan included a set of management guidelines for natural preserves on pages 117 and 118; no similar guidelines appear to have been included in the revised draft. We strongly recommend that these guidelines be reinstated so the plan is clear about how the natural areas will be managed, and what types of use will and will not be permitted.

Recommendations:

- Include a table at the start of Section 4.2.3 that: (1) Defines the various natural area categories (core natural area, buffer, corridor etc.), (2) Describes the management that is permitted for each (timber harvesting), and (3) Describes to what extent the category is required by the conservation easement.
- Move section 4.2.4 to Chapter 9 and treat invasive species comprehensively in that Chapter.
- Ensure that the Natural Heritage Bureau has sufficient resources to implement Objective 1 within the next five years. Data for exemplary natural communities and rare species should not be nearly three decades old on the State's flagship forest.

- Revise Objective 4 to state that long-term study plots that are established to compare active and passive management approaches will be stratified so they are comparing similar vegetation communities occurring on similar physiographic settings.
- Explicitly state under Objective 6 that changes to the natural areas will only be done during a forest management plan revision process.
- Reinstate the section from the 1995 management plan that includes management guidelines for natural preserves (pages 117 – 118), or replace with something similar that provides clear guidelines for what types of uses are and are not permitted in the natural areas.

Chapter 6 - Wildlife

Management of target wildlife species at Nash Stream is hampered by a lack of data relating to patterns of occurrence and abundance, particularly for some of New Hampshire's most imperiled taxa including bats, turtles, odonates, and mollusks. The current plan for collecting these data lacks specifics, particularly in regards to the timeline and the surveying intensity necessary to produce robust data (for example detecting rare species), and a clear commitment to allocating sufficient resources to this important work. We recognize that this lack of commitment stems from the fact that the state agencies tasked with managing Nash Stream Forest are severely underfunded, rather than any lack of recognition of the importance of collecting these data on the part of our state agency partners. However, managing Nash Stream Forest as a model of ecologically-based forestry is predisposed upon having accurate and up-to-date information on the distribution and abundance of species. While outside of the scope of comments on the management plan, we therefore strongly encourage DRED and the General Court to adequately fund research and management at Nash Stream Forest.

The forest management strategy outlined in the revised Nash Stream Management Plan represents a shift from the original plan's focus on long-rotation uneven-aged management which would have produced stands with big trees and high vertical stand diversity, towards an increased use of even-aged management, including clearcutting, with the goal of maintaining a high proportion of young forest (target of 35-55% of working forests as either seedling or sapling/pole, and a target for large sawtimber/old forest in managed areas of <10%). The target for large sawtimber/old forest is important, as it means that it is feasible that very little of the low elevation northern hardwood and softwood forest in NSF will be allowed to gain mature stand characteristics.

Under the Wildlife Chapter Section 6.3. Objective 2, this shift in forest management is justified based on the benefits to early successional species given that "*the current Nash Stream Forest lacks a significant component of regenerating forest*". However, the Nash Stream Forest Wildlife Objective 2 is to provide suitable habitat for the entire suite of primary and secondary target species. The list of species in these two categories ranges from those that prefer forest structure more typically found in young forest to species associated with mature stand characteristics. While the former suite of species will benefit from the shift in management focus towards young forest, there will be less suitable habitat for mature forest associated species.

We do not believe that the desired forest condition outlined in Section 6.3 of the management plan is in keeping with meeting Objective 2 for the following reasons:

(1) The large acreage of forested lands managed for commercial timber production to the east of Nash Stream (and across the commercial timberlands of the North Country in general), means that there is an abundance of early successional habitat in the contiguous forest block thus the argument that a significant component of this forest age structure is lacking from the landscape does not seem well founded.

(2) Areas excluded from harvest in NSF (Natural Preserve, Buffers, and Corridors) and thus allowed to reach mature stand characteristics are primarily high elevation spruce-fir forest. Conversely, lowland northern hardwood forest falls predominantly in areas subject to harvest. This means that the only way the needs of species associated with northern hardwood forest and mature stand characteristics can be met, is if some of the working forest stands can become old forest.

(3) Research has demonstrated that old forests tend to have characteristics that promote forest biodiversity in general including vertical structural diversity, larger snags and downed woody debris, more cavities, and hence more microclimates compared with younger forest stands. This heterogeneity helps to explain why primary natural forests are often more biologically diverse than managed forest stands (Campbell et al., 2011)⁹. While some of these characteristics can be retained in harvested stands, for example through maintaining structural legacies, the most effective way of ensuring this heterogeneity is through keeping a component of old forest stands in the working forest landscape.

Given the concerns listed above, we believe that restoring the emphasis of the original Nash Stream Forest plan on long-rotation uneven-aged management is more in keeping with the goal of providing suitable habitat for all of the primary and secondary species than the revised forest management approach. Importantly, compared to the revised management approach, the vision for forest management outlined in the original plan will lead to vertical and horizontal stand structure that is much closer to what would be found in unharvested forests subject to natural disturbance (North and Keeton, 2008)¹⁰. Using the patterns of forest age and structure found under a natural disturbance regime as a benchmark for forest management is important as we know that the full range of wildlife needs was met by these conditions in the past. The farther that forest management moves stand structure from these baseline conditions, the more likely it is that the needs of some species will not be met. An important aspect of restoring this focus on longer-rotation forestry is to set minimum goals for mature forest stands, and we would like to see a target of 10-15% of the managed NSF lands allowed to attain large sawtimber/old forest characteristics.

Recommendations:

- Restore the original plan's emphasis on long-rotation uneven-aged management and very limited use of clearcutting.

⁹ Campbell, S.P., D.A. Patrick, and J.P. Gibbs. 2011. Biodiversity, conservation biology, and forest health. Pp. 277–320, *in* J.D. Castello and S.A. Teale, (Eds.). *Forest Health*. Cambridge University Press, Cambridge, UK. 392 pp

¹⁰ North, M. and W. Keeton. 2008. Emulating natural disturbance regimes: an emerging approach for sustainable forest management. Chapter 17 *in* R. Laforgezza, J. Chen, G. Sanesi, and T. Crow (eds.) *Landscape Ecology: Sustainable Management of Forest Landscapes*, Springer-Verlag Press. Pages 341-372

- The forest structure goals should be based on long-rotation management and the restoration of and maintenance of a high level of late-successional structures (biological legacies). We believe that a greater portion of the commercial forest area should be in large sawtimber/old forest.
- Remove the language in Section 6.2.1. where it states that “A wetlands survey conducted in 1992 documented amphibian egg masses in thirteen wetlands, thus documenting them as vernal pools”. None of the amphibian species occurring in Nash Stream Forest are vernal pool obligates, thus the presence of egg masses alone is not sufficient to make this designation.
- Provide more specific plans for implementing additional surveys in Section 6.2.2. Wildlife Objective 2 (page 63) with priorities for monitoring non-game species derived from the 2016 New Hampshire Wildlife Action Plan. The only species where a survey intensity is specified is Ruffed Grouse. While we understand both the need to manage game species in NSF and that drumming surveys are part of a statewide effort to monitor grouse, devoting limited resources towards monitoring a species that is widespread across North America and in the North Country, while offering little to no specific plans for monitoring imperiled non-game species does not appear to be the most appropriate allocation of resources. By providing details of these priorities, the Nash Stream Forest plan can offer a clear and compelling rationale for allocation of existing and additional resources.
- Remove the factually incorrect statement regarding stream salamanders not responding to surrounding upland vegetation in Section 6.3 Objective 2 (page 64). Stream salamander habitat quality is highly dependent on surrounding terrestrial habitat which influences factors such as canopy cover and water temperature, availability of leaf litter and woody debris, and input of sediments. Furthermore, all the stream salamanders found in NSF can be found in the surrounding forested habitat during their juvenile and adult life-history stages.

Chapter 7 - Fisheries

We are supportive of the Nash Stream Forest fisheries management plan, which represents a clear example of how rigorous data-collection can be used to inform an adaptive management approach including the combined efforts of the NH Fish and Game Department, NHDRED, and Trout Unlimited to restore Nash Stream as a high-quality cold-water recreational fishery. However, we are not certain that the integration of fisheries management with other uses of Nash Stream Forest as outlined in Section 7.3. Objective 3 is sufficient to ensure that aquatic habitat quality in Nash Stream working forests will be maintained in the future. Specifically, we believe that the forest management practices relating to buffering perennial streams should be strengthened.

The health of aquatic habitat is highly dependent upon forest management practices in adjacent riparian areas (often termed the Riparian Management Zone). Mature trees provide shade and hence regulate water temperature, filter sediments, reduce nutrient inputs, deposit leaves in the stream, and contribute large woody debris which, in turn, provides critical habitat for aquatic organisms. The importance of these features is demonstrated by research conducted in the Northeast Kingdom of Vermont which showed that brook trout abundance was highly correlated with the abundance of large wood in the stream. Furthermore, the importance of large wood in streams has clearly been recognized in Nash Stream itself given the resources that have been put towards manually restoring these features.

The 25' no-harvest riparian buffers for 1st, 2nd, and 4th or higher order perennial streams and 50' no-harvest buffer for 3rd order streams recommended by Good Forestry in the Granite State reflects a compromise between what the best available science indicates is necessary for fully meeting the needs of aquatic life, and the resulting restrictions placed on forest harvesting. There is compelling evidence that these no-harvest zone widths are inadequate for completely ensuring the health of stream ecosystems, and that 100' is needed (Vermont Agency of Natural Resources 2015)¹¹. Given the high value of the cold-water stream ecosystems in Nash Stream, we would like to see a 100' no-cut buffer applied to all perennial streams. This width is sufficient to allow mature trees to grow, shade the stream, and eventually fall and create the vital in-stream habitat needed for a healthy and sustainable fishery. Without this wider buffer, it is highly likely that further stream restoration will be needed in the future to maintain aquatic habitat quality.

Chapter 8 – Forest Management

The management vision set forth in the original 1995 management plan, and carried forward in the revised draft, articulated that Nash Stream would serve as a “model of ecologically-based forestry, emphasizing the growth of long-rotation, high quality, solid wood forest products.” The 1995 Management Plan went on to state (Page 62), under the timber management goals, that “uneven-aged management will be the method of choice for managing and regenerating timber stands,” and that “limited, judiciously applied, and environmental-sound even-aged management (including clearcutting) may be appropriate to provide certain ecological conditions, products, and experiences associated with early successional forests. It will only be used when uneven-aged management will not achieve the Vision.”

While the vision for ecologically-based forestry is unchanged, the revised draft includes a noted change in silvicultural emphasis to incorporate broader use of even-aged management techniques. On Page 94, the revised draft provides the following guidelines for where uneven-aged and even-aged management will be used moving forward:

Uneven-aged management will be used for managing stands with complex tree structures where the goal is to provide diverse within-stand age class and habitat conditions either vertically through single tree selection or horizontally through group and patch selection cutting treatments. Conditions where these goals may be desired are steep slopes, wet or erosive soil conditions, relationship and juxtaposition of stands to streams and water bodies, areas with sensitive visual requirements, certain identified plant or animal communities, developed recreation opportunities or other circumstances where planning determines that it is the best approach to achieve the goals for the property.”

Even-aged management (including clearcutting) will be utilized to: (1) provide normal maintenance of even aged stands (tending) such as with improvement cutting and thinning, (2) to regenerate a range of species from shade tolerant to shade intolerant tree species, (3) develop or maintain certain identified ecological conditions, habitat conditions for certain identified plant or wildlife communities, and (4) provide recreational experiences associated with young forest conditions or simple structured stands in a context of a diverse forest landscape.

¹¹ Vermont Agency of Natural Resources 2015. Riparian Management Guidelines for Agency of Natural Resources Lands

These guidelines suggest that even-aged management will be the more commonly used approach given the narrow conditions, “steep slopes, wet or erosive soils, [proximity] to streams and water bodies...” that are enumerated for where uneven-aged management will be used. Noticeably, the revised draft does not provide a clear rationale or basis for why this change has been made.

The forest structure goals included in the revised draft on pages 64 and 106 also appear to be a departure from the vision of the 1995 plan, and are potentially at odds with the vision in the revised draft. The current forest structure goals would maintain between 35% and 55% of the commercial forest in young forest types, including 5-15% regeneration, and 30-40% saplings and poles. In addition, the goals call for less than 10% to be in large sawtimber, or old forest. The less than 10% goal is problematic because a decision could be made and justified to not include any of the forest in this structure/age class. We are concerned that these structure goals are not consistent with the original vision to manage Nash Stream for a forest that is dominated by mature multi-aged stands.

The revised management approach does not conform as well to the natural disturbance patterns and ecological processes that have been established for northern hardwood forests. The 1995 plan stipulated that “timber management decisions will be determined primarily by ecological and land capabilities, natural site and soil tendencies, *natural disturbance patterns*, and *ecological processes* [emphasis added].” (Page 62).¹² Research has shown that prior to European settlement, New England’s northern hardwood forests were dominated by uneven-aged late-successional and old-growth forests (> 150 years old), with as little as 1-3% in seedling and sapling habitat (1-15 years old)¹³. Natural disturbance patterns were primarily patchy, small-scale openings in the canopy created by tree fall gaps. We recognize that replicating the structure of pre-settlement forests in the commercial forest area at Nash Stream is not wholly practical, but the emphasis on even-aged management, and the goals for young forest are at odds with the natural disturbance patterns and ecological processes that were present in pre-settlement northern hardwood forests. Management that strives to replicate the patterns and process of natural disturbance is even more important today given climate change (see guidelines below included from Perschel et. al. (2007)).¹⁴

It is also clear that the landscape surrounding Nash Stream State Forest includes an abundance of even-aged young forest. Although recent acreage data is not readily available, a review of 2014 National Agriculture Imagery Program (NAIP) imagery plainly shows that even-aged young forests are abundant in Coos County and in the landscape immediately surrounding Nash Stream State Forest. Much of the land in the vicinity of Phillips Brook directly to the east of Nash Stream is even-aged young forest. Nash Stream should be managed taking into account this landscape context, which suggests that the original vision for an older, uneven-aged forest is likely more appropriate. Late successional forests with multiple age classes have been shown to accumulate biological legacies, including large diameter live and dead trees, and large coarse woody material. Restoring and maintaining biological legacies is a goal of all ecologically-focused forestry. The revised draft of the plan makes note of biological legacies in the Timber Management

¹² This language was carried forward to the revised draft and is included on Page 93 at the beginning of Section 8.3

¹³ Lorimer, C.G. and White, A.S., 2003. Scale and frequency of natural disturbances in the northeastern US: implications for early successional forest habitats and regional age distributions. *Forest Ecology and Management* 185, 41-64.

¹⁴ Perschel, R.T., A.M. Evans and M.J. Summers. 2007. *Climate Change, Carbon, and the Forests of the Northeast*. Forest Guild, Santa Fe, NM.

Guidelines on Page 109 (#14), but it's unclear to what extent the management approach in the revised draft will meaningful result in their development and retention.

As mentioned in our comments on Chapter 4, there is very little northern hardwood forest, the dominant forest type at Nash Stream, captured in the natural areas. Although a large portion of Nash Stream State Forest, and The Nature Conservancy's abutting Vickie Bunnell Preserve, are designated as natural areas where timber harvesting will not occur, most of this area is at higher elevation. At Nash Stream, while 82% of the montane spruce-fir forest mapped in the Northeast Habitat data¹⁵ falls within a natural area, or an area designated for limited timber harvesting, the opposite is true for the northern hardwood forest. Roughly 81% of the mapped northern hardwood forest falls within the commercial forest area, and this includes nearly 100% of the northern hardwood forest that is found on the most productive Group 1 Forest Soils. We believe this further illustrates the need to have a greater percentage of the commercial forest in large sawtimber/old forest. The 1995 plan included Control Areas that could have helped to meet this need, while being used to "contrast changes in vegetational composition and structure to areas in which active management is occurring" (Page 78). The Control Areas have been removed from the revised draft however.

As noted above, the forest management approach in the revised draft could be better aligned with currently established recommendations and guidelines for managing for climate change resilience, and pursuing management strategies that can help to combat climate change¹⁶. The Resilient and Connected Landscapes for Terrestrial Resilience report¹⁷ shows the entirety of Nash Stream State Forest as having terrestrial resilience scores that are above average (see enclosed map); the landscape is clearly important from climate change resilience perspective. Given its importance, the following excerpts from Perschel et. al. (2007) seem particularly relevant and important to Nash Stream and managing for climate resilience:

- *"Plants, animals, and ecosystem processes are more likely to survive in managed forests when human disturbances are similar to the patterns and processes of natural disturbances."*
- *"Climate change underscores the importance of mixed-species forestry. Because the effects of climate change are uncertain and each species will react differently, it will be wise to maintain species diversity."*
- *"Another approach, called "continuous cover forestry" in Europe, uses continuous forest canopies to ameliorate the microclimate beneath the canopy. This can lead to higher seedling survival and may affect the overall potential of the forest to store on-site carbon."*

¹⁵ Ferreè, C and M. G. Anderson. 2013. A Map of Terrestrial Habitats of the Northeastern United States: Methods and Approach. The Nature Conservancy, Eastern Conservation Science, Eastern Regional Office. Boston, MA. <https://www.conservationgateway.org/Co>

¹⁶ Swanston, C. and Janowski, M. eds. 2012. Forest adaptation resources: Climate change tools and approaches for land managers. Gen. Tech. Rep. NRS-87. USDA Forest Service, Northern Research Station, Newtown Square, PA.

¹⁷ Anderson, M.G., Barnett, A., Clark, M., Prince, J., Olivero Sheldon, A. and Vickery B. 2016. Resilient and Connected Landscapes for Terrestrial Conservation. The Nature Conservancy, Eastern Conservation Science, Eastern Regional Office. Boston, MA.

- *“Whatever the regeneration method, climate change highlights the importance of preserving legacy trees. Retaining legacy trees or groups help protect plant and animal communities that are under stress because of climate change and under represented on the landscape.”*
- *“The North East State Foresters Association states that “management strategies that encourage larger trees, employ harvest methods that reduce waste and damage to residual trees, and minimize soil disturbance during harvest all improve carbon sequestration activities.”*

These guidelines speak to the need to design management that replicates natural disturbance, retains tree species diversity within stands, maintains forest canopies, and develops and retains biological legacies. Forest and Lands has an excellent opportunity at Nash Stream to demonstrate forward thinking management that applies these principles, and helps to develop a climate resilient landscape in the northern part of the State.

We also are compelled to note that one of the few places in the plan that addresses climate change, the section on Forest Carbon (8.2.2.7), includes the following ill-conceived statement:

*“The interest of some scientists is in the ability of the forest to store increasing amounts of carbon that otherwise would be in the atmosphere and therefore reduce the amount of greenhouse gas believed to cause **so-called anthropogenic or human-induced climate change** [emphasis added].”*

The scientific consensus on climate change, and the role of human greenhouse gas emissions as the primary contributor, is clear and unambiguous. We suggest that this sentence be rewritten to reflect this.

Finally, we believe that the forest management section can be enhanced by addressing the short and long-term outlooks for the forest products industry in the Northeast. It is clear that large changes continue to unfold, with additional paper mills closing in Maine, and other factors. How does the Division of Forest and Lands anticipate these market forces effecting the management of Nash Stream?

Recommendations:

- Restore the original plan’s emphasis on long-rotation uneven-aged management and very limited use of clearcutting
- The forest structure goals should be based on long-rotation management and the restoration of and maintenance of a high level of late-successional structures (biological legacies). We believe that a greater portion of the commercial forest area should be in large sawtimber/old forest.
- The forest management objectives and strategies should incorporate and reflect the latest thinking on climate change, including the best silvicultural practices for building forest resilience, and consideration of ways Nash Stream can be managed to help abate climate change. We strongly encourage Forest and Lands to remove the language referring to “so-called” climate change.
- We believe the plan can be enhanced by addressing the short and long-term outlook of the forest products industry in the Northeast, and how market forces may effect management at Nash Stream.

- Redraft section 8.2.2.7 on Forest Carbon to reflect the scientific consensus on climate change, and the role of human greenhouse gas emissions as the primary contributor

Chapter 9 – Forest Protection

As discussed in our comments on Chapter 4, we suggest moving section 4.2.4 Invasive Plant Species to Chapter 9 Forest Protection. We believe that the threat of invasive plants is best addressed as part of a comprehensive approach that includes forest pests and pathogens, which are covered in Chapter 9. With invasive plants moved to Chapter 9, we recommend renaming Chapter 4 “Rare Species, Exemplary Natural Communities, and Natural Areas,” which will help to provide additional focus on these critical resources found at Nash Stream.

Section 9.2. Forest Health Goals, Strategies and Implementation

It is unclear how management actions related to forest pests and pathogens would be carried out in the natural areas. How would Forest and Lands respond to a spruce budworm outbreak within core natural areas at higher elevation? The plan should more explicitly describe this.

Chapter 10 - Recreation

The Nature Conservancy does not support the proposed expansion of ATV trail infrastructure in Nash Stream. We oppose the establishment of the “Southern Connector Trail” as part of this draft Management Plan.

We believe that for any ATV Trails to even be considered for inclusion in Nash Stream, they should be properly evaluated prior to public consideration as part of a Management Plan revision process. It is not proper to include in this Management Plan a general list of approvals to be met at a future date for a new trail to be established at Nash Stream. The public should be well informed of the location, management and maintenance plans for any ATV/UTV trail proposals in order to be able to make informed comments during the Management Plan revision process.

At this time, the 2017 Draft Management Plan provides little to no information on details regarding the need, location, management, monitoring and maintenance plans, as well as information on the potential impact that the proposed Southern Connector Trail would have on the natural resources of Nash Stream. Without this information, it is impossible for the public to have an informed opinion on the value and impacts of this proposed trail. Because of the questionable manner in which the Kelsey Notch Trail was established, it is essential that any recommendation to expand ATV use on the property be well- informed and transparent to the public. The proposal for a Southern Connector Trail on Nash Stream fails this basic test.

It is important to note that CORD determined that a plan to expand the ATV/UTV trail system at Nash Stream, including a proposed Southern Connector trail, would not be consistent with both the management vision for the property as well as RSA 162-C:6. Because of this, it is our opinion that the proposal for a Southern Connector Trail should have not been included for consideration as part of the draft Management Plan.

As discussed earlier in our comments, The Council on Resources and Development (CORD) has a statutory obligation to ensure the proper management of Nash Stream under 162-C:6. In their deliberations on the subject of ATV/UTV use on the property, CORD has issued general findings which clarify how trails are established and maintained on the property. As a key piece of the management of the property, these guidelines should be fully incorporated into the language of the 2017 Management Plan. In addition, CORD has determined that the Kelsey Notch Trail shall be considered a Pilot Trail for three years (beginning in 2017) and subject to further review. TNC believes that the draft Management Plan should reflect these decisions.

Recommendations:

- **10.1.4 All-Terrain Vehicle (ATV) and Utility Task Vehicles (UTV)**

We contend that the establishment of the Kelsey Notch Trail was not “similar to the West Side Trail” as referenced in this section. The West Side Trail was identified specifically in the 2002 Management Plan revisions as the only allowed ATV Trail on the property. As discussed earlier in these comments, the Kelsey Notch Trail was not identified in the Management Plan which is in clear violation of RSA 215-A:42(d). In addition, CORD has determined that it is unable to determine if the Kelsey Notch Trail is consistent with CORD’s Management obligations. The Kelsey Notch Trail at a minimum should remain a Pilot Trail, and CORD has determined that it may be discontinued if certain criteria cannot be met and documented. This section should be redrafted to provide the public this information regarding the history, controversy and current status of the Kelsey Notch Trail.

- **10.3 Recreation Management Goals**

On page 130, we observe several the omission of several key phrases which we consider to be important in establishing environmental integrity as a parameter for recreation management on the Forest. For example, the previous goal language had a 2nd sentence that said “Management decisions will be consistent with the guiding philosophy of protecting the environmental integrity of the land.” Other key phrases in the 1995 Management Plan were: “strive for levels of recreational use that uphold the Vision and that are sensitive to and respectful of the natural values of the Nash Stream Forest” and “Protection of the natural resources and environmental quality will be of primary concerns in recreation management.” This language should be reinserted into this section.

- **10.3.4 ATV and UTV Use**

This section should more clearly address CORD’s general finding language in their December 14th letter of decision, specifically that “(1)the trails must be designed, sited, and used so that it preserves and does not adversely impact natural resources and conservation attributes of the property and does not interfere with or detract from the other uses of Nash Stream Forest”; and “(4) after construction, the trail must be continually managed to protect natural resources and conservation attributes and to limit interference with other uses of Nash Stream Forest

Objective 2 and Objective 3, regarding proposed expansion of the trail system, should be removed from consideration in the plan.

- **10.3.7 Camping**

If State Parks is to evaluate “the future possibility of a small campground or clusters of minimal structures such as yurts” on the property, they do so in keeping with the provisions established in the 1995 Management Plan on page 63, including:

D: Recreation management will emphasize low impact use, carry in/carry out, and dispersed use.

E. Only low impact, relatively primitive tent sites and other recreation facilities will be permitted.

The Nature Conservancy would advocate that the guidance provided in the Management Goals for Recreation (page 63 of 1995 Plan) also be incorporated fully into the draft 2017 Management Plan.

Chapter 11 - Public Use Guidelines

The Vision for Nash Stream State Forest was for dispersed low-impact uses, and as such only back-country sites were contemplated. Thus Guideline #3 on page 136 should specify back-country camping only

Conclusion


Thank you for this opportunity to provide comments on the draft 2017 Nash Stream Management Plan. As we stated at the beginning of this letter, The Nature Conservancy appreciates the hard work that has gone into this revision of the Nash Stream Forest Management Plan. However, we have significant concerns with the direction of the draft plan.

Because of the substantial changes made by the department to the previous Management Plan, and the level of concern expressed by stakeholders to these changes, The Nature Conservancy suggests that the department prepare another draft of this Management Plan for additional public comment this spring. Further, we would appreciate the department providing a draft plan which clearly identifies where edits and changes have been made so the reader can more easily identify and fully appreciate the changes made.

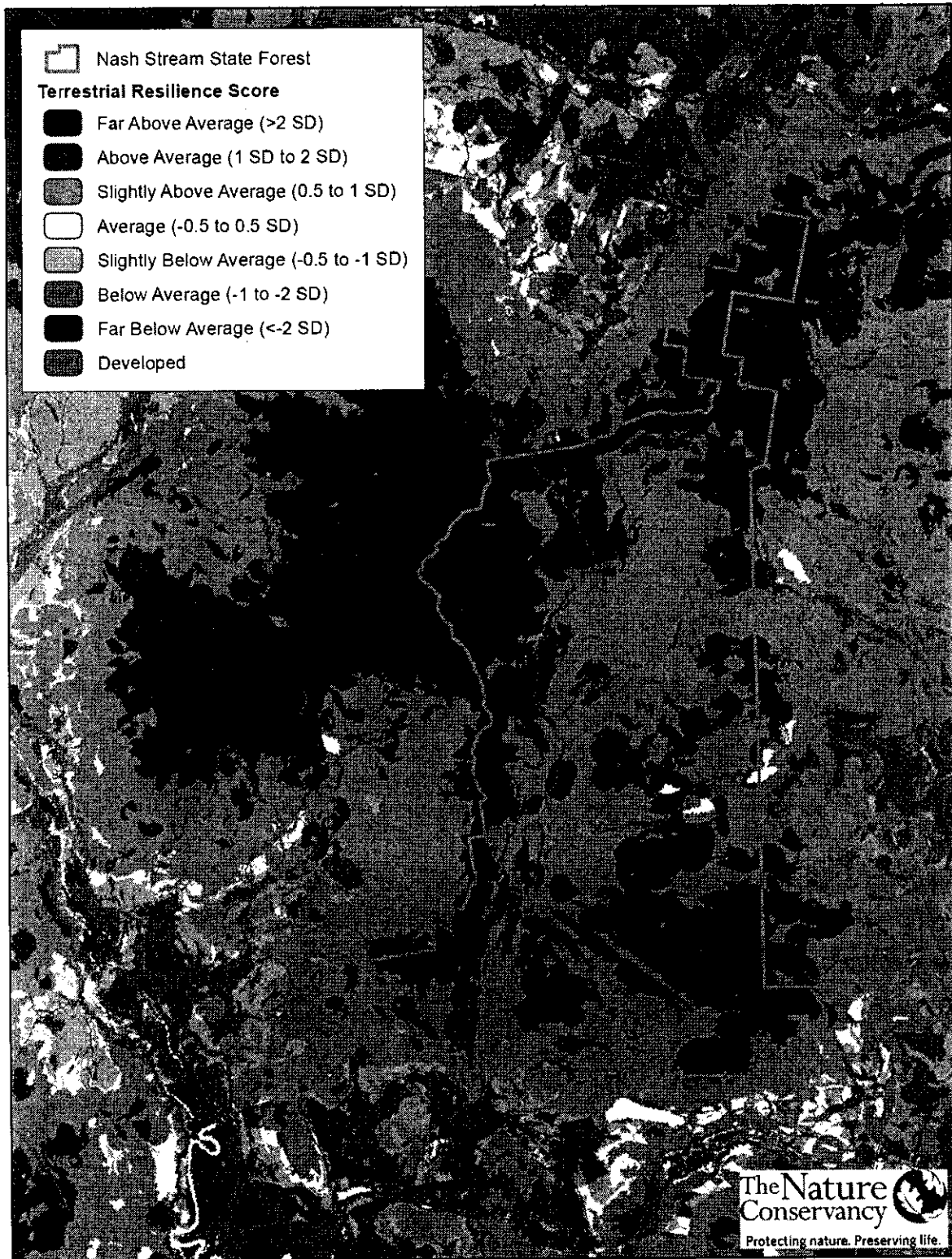
Finally, the conservation staff of The Nature Conservancy are always willing to meet with DRED, and additional stakeholders at any time to discuss in detail these comments and suggestions.

Thank you for your consideration of our comments.

Sincerely,



Jim O'Brien
Director of External Affairs
The Nature Conservancy In New Hampshire
22 Bridge Street, 4th Floor
Concord, NH 03301
603.224.5853 X 28
Jim_obrien@tnc.org



Guinn, William

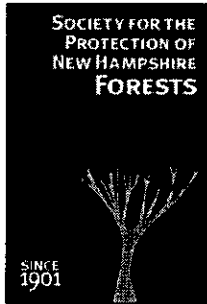
From: Will Abbott <wabbott@forestsociety.org>
Sent: Friday, March 03, 2017 4:29 PM
To: DRED: Nash Stream Plan
Cc: Simpkins, Brad
Subject: SPNHF Comments
Attachments: SPNHF Nash Stream Comments 3 3 17.pdf

Brad

Attached please find comments from the Forest Society on the draft Nash Stream Forest Management Plan.

Happy to discuss further if helpful.

Will Abbott
VP for Policy & Reservation Stewardship
Society for the Protection of NH Forests
54 Portsmouth Street
Concord, NH 03301
Phone 603 224-9945, Ext 327'
Cell 603 496-7019
Website: www.forestsociety.org



54 Portsmouth Street
Concord, NH 03301

Tel. 603.224.9945
Fax 603.228.0423

Info@forestsociety.org
www.forestsociety.org

March 3, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

The Forest Society is pleased to present these comments concerning the draft Nash Stream Management Plan, comments which complement the joint letter submitted February 9, 2017 by the Society, the Appalachian Mountain Club and The Nature Conservancy concerning ATV use of Nash Stream as outlined in the draft plan.

Our comments below address areas where we think the draft plan could and should be improved.

Management Vision

One concern we have is with the vision for the property as described in the draft plan. The narrative suggests that the draft plan vision largely mimics the "spirit" of the original 1995 management plan. Whether intended or not, we see changes in the content of the draft plan's vision that suggest a departure from the vision articulated in the 1995 plan. Perhaps the most significant departure is the absence in the draft plan of a comprehensive monitoring program to assure that the management vision and plan objectives are evaluated in a way that validates whether the objectives are consistently being attained or, as important, whether adjustments are warranted based on such evaluation. While the 1995 commitment remains in the draft plan to manage the Nash Stream Forest as "a model of environmentally sound public land Stewardship" (which we strongly support and agree with), we strongly recommend that the plan now under consideration incorporate a comprehensive evaluation and monitoring program similar to that proposed in the 1995 plan.

Forest Management, Inventory & Planning

A second set of concerns relate to Chapter 8, which addresses forest management. We are generally supportive of DRED's work that identifies the 28,000 acres suitable for timber management and the balance of the land to be set aside as natural areas and/or inoperable areas. We support the silvicultural practices identified in the draft plan as appropriate to the management goals identified, with one exception. We believe the timber management goals as presented should be modified to be consistent with the 1995 plan's expressed goal to only use even age management when no other means to accomplish the forest management goals exist.

Another issue that greatly concerns us about the draft plan is the schedule for forest resource inventories for the 28,000 acres managed for timber. The draft plan seems resigned to only updating these inventories as state appropriations allow. This should not be

the standard by which forest inventories are determined. Rather, the preferred schedule for forest inventories, particularly of the compartments that make up the 28,000 acres available for timber management, should be clearly established in the plan and should be performed on a schedule that fully informs the desired forest management outcomes. We recommend a schedule that makes it a priority for the inventory of each compartment within the 28,000 acres open to management to occur at least once every 15 years.

We are encouraged to see that Continuous Forest Inventory is one tool the draft plan proposes to use for long term monitoring of forest conditions. These plots will provide vital information to inform the forest management objectives set forth in the draft plan.

Forest Carbon

We support the draft plan's inclusion of forest carbon as one of several forest products recognized by the draft plan. However, the draft plan should not stop with this observation. It should also include some consideration to accommodate adjustments to the plan that may serve the goals of 1) storing more carbon in the Nash Stream Forest and/or 2) preparing Nash Stream Forest for emerging carbon markets. Some additional effort should be made to address these issues. If Nash Stream Forest is to be an exemplar for how New Hampshire manages public forest land, its management plan should include proactive actions that promote carbon sequestration. This set of actions at Nash Stream Forest would be consistent with specific recommendations in the New Hampshire Climate Action Plan, adopted in April 2009. In addition, these actions could also inform the management goals for the additional 110,000 acres of New Hampshire's publicly owned forest land.

We urge the Division of Forests and Lands to present a final Nash Stream Forest Management Plan that:

- 1) includes a comprehensive monitor program akin to the proposal in the 1995 plan,
- 2) specifically limits even age management to use only when no other means exists to secure desired forest management objectives,
- 3) uses a 15 year schedule for inventorying all compartments open to forest management, and
- 4) provides additional consideration of managing the forest for yet to be determined carbon storage goals and of preparing for potential participation in emerging carbon markets.

In addition, as we wrote on February 9, we strongly urge that this plan limit future ATV/OHRV use of Nash Stream Forest during the planning period to the two current trails (West Side Road and Kelsey Notch) under conditions specified by the Council of Resources and Development in its December 2016 guidance letter.

Thank you for the enormous effort the Division and its staff have put into crafting this draft plan, and for this this opportunity to offer comments.

Sincerely,



Will Abbott
Vice President for Policy & Reservation Stewardship

Guinn, William

From: Amanda Merrill <mandymerrill60@gmail.com>
Sent: Friday, March 03, 2017 5:28 PM
To: DRED: Nash Stream Plan
Subject: Fwd: comments re NSF draft plan update
Attachments: CORD comments NSF plan 3-3-2017 - CGA and MM TB edits.docx

My apologies. I just realized I sent directly to Brad Simpkins instead of to this address.

----- Forwarded message -----

From: Amanda Merrill <mandymerrill60@gmail.com>
Date: Fri, Mar 3, 2017 at 4:13 PM
Subject: comments re NSF draft plan update
To: "Simpkins, Brad" <Brad.Simpkins@dred.nh.gov>, Tracey Boisvert <tracey.boisvert@nh.gov>

Hi, Brad- Attached are some comments for the NSF plan update file. You'll see the comments reference 4 attachments. Tracey is getting them together for me (I was really last minute with this effort) and on Monday will re-send my comments with the attachments included. The attachments are all docs that you have, but I thought for purposes of my comments it was useful to have them all together in one packet. Let me know if you have questions! Hope you're well. Mandy

March 3, 2017

Dear Director Simpkins:

Thank you for the opportunity to provide comments regarding the draft Nash Stream Forest Management Plan update. My comments are limited to the proposed ATV/UTV-related objectives listed in the Recreation Management Goals section of Chapter 10 (Recreation) and are based on the relevant review, findings, and discussions of the Council on Resources and Development (CORD), the interagency panel chaired by the Director of the Office of Energy and Planning (OEP), per RSA 162-C:1. I offer them as former chair of CORD and point out that they have not been reviewed by other CORD members.

Under RSA 162-C:6, CORD is charged with the management of land interests acquired by the State through the land conservation investment program (LCIP) under the former RSA 221-A— including the Nash Stream Forest, the largest by far at almost 40,000 acres. CORD has the responsibility to manage these lands so as to “preserve the natural beauty, landscape, rural character, natural resources, and high quality of life in New Hampshire. The council shall maintain and protect benefits derived from such lands and maintain public access to such lands, where appropriate.” (RSA 162-C:6, III)

Over the past ten months, CORD has been involved in extensive discussions and deliberations regarding the application of its responsibilities under RSA 162-C to the specific question of ATV/UTV use on Nash Stream. In May 2016, three organizations (the Society for the Protection of NH Forests, The Nature Conservancy, and the Appalachian Mountain Club) asked CORD to review the legality of the two existing Nash Stream ATV/UTV trails. CORD responded to the request, approving findings addressing each of the trails, as well as general findings for use in consideration of any future trails, at its December 8, 2016 meeting. At the same meeting, CORD responded to a request from DRED for guidance as to potential options for language to be included in their management plan update regarding future ATV/UTV policy.

I have included four attachments which I hope will be useful in clarifying CORD’s statutory responsibilities and its decision making over the past few months with regard to the issue of ATV/UTV use on Nash Stream. Attachment 1 is the full text of RSA 162-C. Attachment 2 is a background document provided to CORD members in December 2016 by me as then-Chair and OEP staff; this includes a brief history of Nash Stream ATV/UTV policy to date. Attachment 3 is a briefing paper provided to CORD by DRED outlining three options for future ATV/UTV policy under consideration at that time for inclusion in the management plan update. Attachment 4 is the December 14, 2016 letter sent to you and Trails Bureau Chief Gamache which summarizes the findings adopted by CORD at its December 8 meeting, as well as its guidance to DRED regarding management plan language; it includes the actual findings and the motion adopted regarding plan update language options.

While I believe it is worthwhile to give an overview of CORD’s recent involvement with the issue of Nash Stream ATV/UTV policy, I recognize that, of course, the guidance given by CORD to DRED on December 8 regarding potential ATV/UTV-related language in the new management plan is most directly relevant to the task at hand, for which DRED has solicited

comment—i.e., completing the long process of updating the management plan. I think it worth underlining the fact that CORD has not taken a position—or been asked to take a position at this time—on the specific language in the draft currently under review. I am confident that DRED has taken CORD's guidance regarding future ATV/UTV use very seriously and that this is reflected in current draft language. However, I am compelled to point out that Objective 2 of the Management Goals for ATV/UTV use may be interpreted as inconsistent with CORD's guidance. This objective calls for evaluation of a potential southern connector trail. At the December 8, 2016 CORD meeting, Option 3 of the proposals presented to CORD by DRED—and most important, the one found by members to be inconsistent with the principles of RSA 162-C:6—included adoption of a southern connector. At the same time, it should be noted that 1) CORD's discussion of Option 3 focused on concerns regarding the proposed East/West Corridor and not on the southern connector, and 2) it is my understanding that the southern connector under consideration in the current draft plan update is not in the same location as that referred to in Option 3. It should also be noted that the draft plan language spells out the process to be followed in considering the proposed trail, including CORD review and approval, but does not specifically refer to CORD's general findings adopted on December 8, 2016 for any use of ATV/UTVs in Nash Stream.

I appreciate all the work that has gone into development of the new Nash Stream Management Plan and the shared concern for protection of this wonderful property that guides this effort.

Sincerely,

Amanda Merrill
Chair, CORD (6/20/16-1/31/17)

TITLE XII
PUBLIC SAFETY AND WELFARE
CHAPTER 162-C
COUNCIL ON RESOURCES AND DEVELOPMENT

Section 162-C:1

162-C:1 Council Established. – There is established a council on resources and development which shall include the following members:

- I. The director or assistant director of the office of energy and planning who shall serve as chairperson of the council.
- II. The commissioner or appropriate division director, department of resources and economic development, or designee.
- III. The commissioner or assistant commissioner, department of environmental services, or designee.
- IV. The commissioner or appropriate division director, department of agriculture, markets, and food, or designee.
- V. The executive director or appropriate division director, fish and game department, or designee.
- VI. The commissioner or assistant commissioner, department of safety, or designee.
- VII. The commissioner of the department of health and human services or a member of the senior management team, or designee.
- VIII. The commissioner or assistant commissioner, department of education, or designee.
- IX. The commissioner or assistant commissioner, department of transportation, or designee.
- X. The commissioner or appropriate division director, department of cultural resources, or designee.
- XI. The commissioner or appropriate division director, department of administrative services, or designee.
- XII. The executive director or chairman of the New Hampshire housing finance authority, or designee.

Source. 1963, 301:1. 1965, 212:1. 1986, 176:3; 202:6, I(c), (f). 1987, 283:5. 1995, 130:4; 310:182. 1999, 59:1. 2001, 249:2. 2003, 319:9,127. 2004, 171:19; 257:44. 2008, 150:1, eff. June 6, 2008.

Section 162-C:2

162-C:2 Responsibilities. – The council shall:

- I. Consult upon common problems in the fields of environmental protection, natural resources, and growth management including the encouragement of smart growth;
- II. Consult with, negotiate with, and obtain information from, any federal or state agency concerned with any of the council's problems, reports, recommendations or studies;
- III. Make biennial reports and recommendations, as may be desirable, to the governor and council;
- IV. Make studies and recommendations concerning changes to effectively coordinate the work of the agencies which have membership in the council;
- V. Resolve differences or conflicts concerning development, resource management, or the encouragement of smart growth which result from the work of any agency represented on the council in developing policies, plans, or programs. The council shall investigate; if possible, resolve the problem; and if appropriate, submit its recommendations to the governor and council or to the general court. If investigation by the council shows that the laws and rules of an agency represented on the council are in conflict with those of another agency, the council shall submit a report with recommendations to the governor and council or to the general court;
- VI. Resolve differences and conflicts among the agencies and departments of the state in the implementation of the tourism policy under RSA 12-A:23;
- VII. Review the disposal of state owned real property pursuant to RSA 4:40;
- VIII. Provide oversight relative to the statewide public boat access program, work with the public water access advisory board and provide recommendations to the governor and executive council regarding public access;

IX. Complete the smart growth report required under RSA 9-B:6;

X. Review and coordinate the distribution of funds by state agencies to local and regional entities to encourage consistency with and provide support for New Hampshire's smart growth policies under RSA 9-B:4;

XI. Review the following actions by state agencies and ensure, in consultation with the long range capital planning and utilization committee established by RSA 17-M:1-3, that these actions are taken into consideration in the long range capital improvement program that is updated every 2 years in conjunction with the capital budget process, and provide recommendations to the governor regarding whether the actions are consistent with New Hampshire's smart growth policies under RSA 9-B:5:

(a) Capital budget requests;

(b) Building operation and maintenance plans; and

(c) Facility location and planning; and

XII. Facilitate coordination of state agencies to support local, regional, and state planning efforts consistent with RSA 9-A:1-4.

Source. 1963, 301:2. 1965, 212:2. 1973, 140:7. 1981, 364:1. 1986, 165:3; 224:5. 1987, 283:6, 7. 1992, 265:6. 2000, 292:7. 2001, 249:3. 2006, 307:2. 2008, 150:2, eff. June 6, 2008.

Section 162-C:3

162-C:3 Tenure of Members. – Members shall serve without compensation, and any member's term of office shall terminate when he ceases to be a member of the state agency he represents.

Source. 1963, 301:3. 1965, 212:3, eff. July 1, 1965.

Section 162-C:4

162-C:4 Meetings. – The council shall meet at least once every 3 months, but may meet more often as it shall determine. The chairman shall prepare and deliver an agenda to all members at least 7 days in advance of each meeting. The council shall provide a copy of the minutes from each meeting to the senate president, the speaker of the house of representatives, the long range capital planning and utilization committee, and the governor and council.

Source. 1963, 301:4. 1965, 212:4. 1987, 283:8. 2006, 307:3, eff. July 1, 2006.

Section 162-C:5

162-C:5 Staff. – The council may employ staff needed to carry out its responsibilities.

Source. 1981, 364:2, eff. Aug. 22, 1981.

Land Conservation Investment Program

Section 162-C:6

162-C:6 Purpose; Management. –

I. The general court recognizes that in order to maintain New Hampshire's distinctive quality of life, strong economic growth must be balanced with responsible conservation initiatives, and that the history of conservation in New Hampshire has been marked by cooperation among government, business, individuals, and conservation organizations. The general court further recognizes the strong traditions of both public and private land ownership and use, and the need to respect investments in the conservation of natural resource lands in the state for the perpetual use of the people of New Hampshire. In addition, the general court recognizes that the land conservation investment program was undertaken, in part, with significant donations of cash and land value by citizens of the state who intended that the conservation value of these lands be protected in perpetuity.

II. In addition to its other responsibilities, the council shall manage and administer the lands acquired and funds

established under the land conservation investment program under the former RSA 221-A, according to the provisions of this subdivision and consistent with agreements entered into with persons with ownership interests in such lands.

III. The council shall manage the lands acquired under the former RSA 221-A so as to preserve the natural beauty, landscape, rural character, natural resources, and high quality of life in New Hampshire. The council shall maintain and protect benefits derived from such lands and maintain public access to such lands, where appropriate. On state-owned lands, whenever the council shall deem it in the best interest of conservation and protection of the values outlined in this section, it may, with the consent of the governor, authorize the exchange of any interest in the property when the conservation values of the property would be degraded if no action were taken. Prior to submitting a request to the governor to exchange any interest in the property, the council shall provide at least 30 calendar days advance notice to the local governing body and conservation commission. Such exchanges shall be reviewed and approved by the council, shall involve lands contiguous to the original acquisition which have equal or greater conservation value, and shall convey only those interests necessary to compensate for the potential degradation.

IV. Notwithstanding paragraphs I-III, the council shall recognize that the interest of public safety and welfare may, from time to time, require minor expansion, minor modification, or minor alteration of existing roads within the state highway system. After review and approval by the council, and notwithstanding RSA 162-C:10, the department of transportation may obtain interests in lands acquired under the former RSA 221-A adjacent to state highways. Permissible expansion, modification, or alterations under this section shall include drainage easements, slope easements, lane widening, the addition of a passing, climbing, or turning lane, or similar adjustments, but shall not include construction of a new highway or portion thereof, construction of a bypass for an existing highway, or similar major alterations. Approval shall not be granted if reasonable and prudent alternatives exist nor if individual or cumulative approvals are likely to materially impair the conservation purposes for which the parcel was originally protected. Projects determined by the council to be outside of the scope permitted by this subdivision shall require approval from the general court.

V. The review and approval process required by paragraph IV shall give full consideration to the management provisions contained in paragraphs I-III. The department of transportation shall submit a written request to the council with plans and supporting documentation to demonstrate compliance with the provisions of this chapter. A quorum of the council, consisting of at least 6 members, shall hold a public hearing within 90 days of receipt of a complete request to release land conservation investment program interests. The council shall provide at least 10 calendar days notice in advance of such hearing. Notification shall be made, at the expense of the department, to the landowner, local governing body and conservation commission, abutters, the Society for the Protection of New Hampshire Forests, The Nature Conservancy, the Audubon Society of New Hampshire, the New Hampshire Wildlife Federation, and the county conservation district, or their successors. Notification of the public hearing shall be published, by the department, in a paper of general circulation in the municipality and shall be posted, by the department, in at least 2 public places. At the hearing or within 15 days after the hearing, a majority of the council members attending the hearing shall vote to approve or deny the application, unless a time extension is requested by the department. Aggrieved parties, which include all parties who must be notified under this paragraph, may appeal the council's decision to the superior court in the same manner as planning board decisions are appealed under RSA 677:15.

VI. Compensation for any interest in land obtained by the state department of transportation under this section shall be at the appraised full fair market value of those property interests at the time of the department's acquisition. Alternative forms of compensation such as replacement land with comparable conservation value, or a combination of monetary compensation and replacement land may be considered in appropriate circumstances provided all parties owning an interest in the property agree to such terms.

VII. Compensation due to the state under this section shall be deposited in the trust fund of the New Hampshire land and community heritage investment program established under RSA 227-M and used for the purposes of that program. Compensation due to municipalities shall be dedicated to the acquisition or monitoring of protected lands consistent with the purposes of this chapter. Compensation due to landowners of conservation easement lands shall be as specified in the conservation easement, deed, or as otherwise negotiated. Any party aggrieved by the amount of compensation may file a petition with the superior court in the same manner as damage appeals are filed from the board of tax and land appeals under RSA 498-A:27.

Source. 1995, 10:4. 1998, 364:1. 2000, 245:2, eff. June 8, 2000.

Section 162-C:7

162-C:7 Powers and Duties. – The council shall oversee, direct, and expend funds in the monitoring endowment of the former New Hampshire land conservation investment program in accordance with the purposes of this subdivision and RSA 227-M:12. This includes, but is not limited to, the authority to draw upon funds for the administrative costs of the endowment.

Source. 1995, 10:4. 2000, 245:3, eff. June 8, 2000.

Section 162-C:8

162-C:8 Monitoring Endowment. –

I. The monitoring endowment established by the board of directors pursuant to former RSA 221-A:5, III shall be maintained in perpetuity and shall be utilized by the council only for the purposes of monitoring and enforcing the property rights of persons with ownership interests in property acquired through the former land conservation investment program. Additional contributions to the endowment pursuant to RSA 227-M:12, I shall be accounted for separately and shall be utilized only for the purposes of RSA 227-M:12, II. Additional gifts, donations, and grants to the endowment may be utilized for monitoring and enforcing other land conservation interests that may be acquired by the state of New Hampshire.

II. The principal of the endowment shall be managed by the state treasurer for the sole purpose of providing a perpetual source of income, as defined by the state treasurer, for the purposes set forth in this subdivision and RSA 227-M:12.

III. Any income earned on the endowment principal which is not used for the purposes set forth in this subdivision and RSA 227-M:12 within the fiscal year in which it is earned shall be nonlapsing. The state treasurer is authorized to accept gifts, donations, and grants, including federal gifts, donations, and grants, for the purposes set forth in this chapter, and such gifts, donations and grants shall be added to the principal amount.

IV. The council shall, pursuant to the monitoring endowment established under former RSA 221-A:5, III, and the provisions of RSA 162-C:8, I, prepare an annual report to be presented no later than December 1 of each year to the speaker of the house, the president of the senate, the governor, the house clerk, the senate clerk, and the state library. The report shall include a listing of all lands and interests in lands subject to the monitoring provisions of RSA 162-C:7, I and a complete financial accounting of the funds in the monitoring endowment including expenditures for the most recent full fiscal year. The report shall also summarize monitoring activities and findings for each property, as conducted in the most recent full fiscal year.

Source. 1995, 10:4. 2000, 245:4. 2002, 86:2. 2004, 257:47. 2007, 151:1, eff. Aug. 17, 2007.

Section 162-C:9

162-C:9 Management. –

I. Each assignment of land under this subdivision to a state agency or a municipality shall be subject to review and reassignment if the council deems it advisable.

II. No lands purchased in fee for permanent state ownership under the former RSA 221-A shall be posted to prohibit hunting or fishing, unless the council, by a majority vote of the voting members, deems such posting to be necessary to protect the interests of the state and the safety of its citizens, or upon recommendation of the fish and game commission or the division of forests and lands.

Source. 1995, 10:4. 2006, 307:4, eff. July 1, 2006.

Section 162-C:10

162-C:10 Public Trust. – The lands and interests in lands acquired under the former RSA 221-A through the use of the trust fund for the program shall be held in public trust and used and applied for the purposes of this subdivision. Notwithstanding any other provision of law relating to the disposal of publicly-owned real estate, no deviation in the uses of any land or interest in land so acquired to uses or purposes not consistent with the purposes

of this subdivision shall be permitted. The sale, transfer, conveyance, or release of any such land or interest in land from public trust is prohibited.

Source. 1995, 10:4, eff. April 12, 1995.

Section 162-C:11

162-C:11 Public Access; Liability. – No person, or the person's successor in title, who has granted or sold rights of public access by virtue of an easement, right-of-way, development right, or other means in accordance with the purposes of this subdivision shall be liable to a user of that right of access for injuries suffered on that portion of the access way unless those injuries are caused by the willful or wanton misconduct of the grantor or successor in title.

Source. 1995, 10:4, eff. April 12, 1995.

Commission to Develop a Land Conservation Plan

Section 162-C:12

[RSA 162-C:12 repealed by 2015, 174:2, effective December 31, 2016.]

162-C:12 Commission Established. –

I. The general court finds that adequate protection of New Hampshire's natural assets is essential to maintaining and safeguarding the state's economy and character for today's population and for future generations. Continued and increased state investment in land and natural resource protection is not a luxury item in the state budget but is essential to our state's continued prosperity. To further this objective, there is established a commission to develop a long-term New Hampshire state conservation plan. The members of the commission shall be as follows:

- (a) One member of the senate, appointed by the president of the senate.
- (b) One member of the resources, recreation and development committee of the house of representatives, appointed by the speaker of the house of representatives.
- (c) One member from the New Hampshire Association of Conservation Commissions to represent municipal conservation interests, appointed by that association.
- (d) Three representatives of statewide or regional conservation organizations, appointed by the governor.
- (e) One person representing business and industry, appointed by the Business and Industry Association.
- (f) One person representing hunting, fishing, and other outdoor recreation, appointed by the fish and game commission.
- (g) One person representing real estate interests, appointed by the New Hampshire Association of Realtors.
- (h) One member of the New Hampshire Farm Bureau Federation, appointed by that organization.
- (i) One person representing the forest products industry, appointed by the New Hampshire Timberland Owners Association.

II. Legislative members of the commission shall receive mileage at the legislative rate when attending to the duties of the commission.

III. The commission shall develop an implementation plan based in part on the findings and future next steps contained in the SB 388 (2014, 148) report. In developing this plan, the commission shall:

- (a) Review the final report of the SB 388 (2014, 148) study committee, and any additional reports and studies it deems appropriate on the status of voluntary land conservation and the protection of New Hampshire's natural resources.
- (b) Solicit input from state agencies, including but not limited to, the department of resources and economic development, the department of environmental services, the fish and game department, the department of agriculture, markets, and foods, and the department of revenue administration.
- (c) Solicit input from the public, nonprofit organizations, the land and community heritage investment program, regional planning commissions, the university of New Hampshire cooperative extension service, businesses and other stakeholders, and from representatives of land conservation initiatives in other states.

IV. The commission's final report shall identify specific natural resource protection priorities requiring further

state investment over the next 5 years, a process for reviewing and revising priorities on a periodic basis, and a strategy for collaboration and funding among federal, state, regional, municipal, and nongovernmental partners to achieve the commission's stated conservation goals. In developing these priorities, the commission shall ensure:

- (a) Adequate quality and quantity of current and future water supplies for domestic, industrial, and recreational uses;
- (b) Protection of adequate areas of productive soils to support current and future agricultural activities;
- (c) The maintenance of an adequate forest land base to enable sustainable production of forest products for present and future generations;
- (d) The protection of adequate core habitat and linkage areas to maintain the state's diverse native plant and animal populations.
- (e) The maintenance of an adequate land base to support motorized and non-motorized recreational activities;
- (f) The protection of scenic vistas and land with unique physical features that support the state's quality of life and a strong tourism economy; and
- (g) Any other conservation benefits that the commission deems appropriate.

V. The chairperson shall be the senate member. The first meeting of the commission shall be called by the chairperson and shall be held within 60 days of the effective date of this section. Appropriate legislative research entities shall provide assistance and support to the commission as necessary. Eight members of the commission shall constitute a quorum.

VI. The commission may accept financial support and other resources in the development of its work and reports.

VII. The commission may form subcommittees or appoint technical committees composed of commission members and nonmembers to advance the goals of this section.

VIII. The commission shall report its findings and any recommendations for proposed legislation to the speaker of the house of representatives, the president of the senate, the house clerk, the senate clerk, the governor, the chairperson of the house resources, recreation and development committee, the chairperson of the house finance committee, the chairperson of the senate energy and natural resources committee, the chairperson of the senate finance committee, and the state library on or before September 15, 2016.

Source. 2015, 174:1, eff. June 26, 2015.

OEP Staff Memo to CORD Members
November 10, 2016
ATV Use on the West Side Trail and Kelsey Notch Trail in Nash Stream Forest

Background

Under RSA 162-C:6, the Council on Resources and Development (CORD) is charged with the management of land interests acquired by the State through the land conservation investment program (LCIP). CORD shall manage such lands to “preserve the natural beauty, landscape, rural character, natural resources, and high quality of life in New Hampshire. The council shall maintain and protect benefits derived from such lands and maintain public access to such lands, where appropriate” (RSA 162-C:6, III)

The Nash Stream Forest is by far the largest of the LCIP properties, spanning almost 40,000 acres in the towns of Columbia, Stratford, Stark, and Odell. The State acquired it in 1988 and concurrently sold a conservation easement on the property to the U.S. Forest Service. Its day-to-day management is carried out under the supervision of the Department of Resources and Economic Development (DRED). As described in the original (1995) Nash Stream Management Plan, permitted activities on Nash Stream included timber harvesting, passive recreation, and snowmobiling; ATV use was prohibited.

A 2002 update of the Management Plan provided for the establishment of one pilot ATV trail in Nash Stream Forest (the West Side trail). The trail was opened for use that year as a three year pilot, then extended two years by DRED Commissioner George Bald before being established as a “designated” trail in 2007. Located in Stratford, the West Side Trail is a nine-mile loop into and out of Nash Stream Forest and is part of a local ATV trail network.

In 2001, prior to the management plan update, upon request for guidance from the director of the Division of Forests and Lands, an attorney for the U.S. Forest Service opined that recreation management on Nash Stream is a right reserved by the State and therefore the State has the discretion to allow ATV use within its borders.

A second trail, known as the Kelsey Notch Trail, was opened as a pilot trail for ATV use in 2013. The Kelsey Notch Trail covers 2.5 miles in Columbia, near the northern border of the Nash Stream Forest. It is currently being used as part of the larger “Ride-the-Wilds” network.

In a letter to CORD members dated May 6, 2016, representatives from the Society for the Protection of New Hampshire Forests, the Appalachian Mountain Club, and The Nature Conservancy (the Advocates) voiced their concern about current ATV use in the Nash Stream Forest, as well as potential expansion of such use. The Advocates requested that the Council review the requirements of RSA 162-C:6, II & III (and RSA 215-A:43 regarding establishment of ATV trails) and subsequently “determine that the existing ATV trails are not in compliance with the law and take appropriate action.”

NASH STREAM FOREST OHRV BRIEFING PAPER

Nash Stream Forest (“Nash Stream”) is the largest state reservation, at roughly 40,000 acres. The acquisition of Nash Stream occurred in 1988; it was complicated and took many years to close. When these lands went up for sale, there was a great concern by the conservation community that they would be bought up and developed based upon the sale price at the time. Funds to permanently protect this piece of property came from state, federal and conservation organization dollars, which included a conservation easement (the “Easement”) held by the federal government.

The first Nash Stream management plan (the “Plan”) took seven years to write by a specific technical team, along with considerable public input. The Plan, which was completed in 1995, stressed that recreation be low-impact and dispersed. There was a fine balance between keeping this as a working forest, but to also practice ecological-based, sustainable forestry. Large reserves were set aside during this process to allow for the natural processes to take place with little to no human disturbance.

In 2002 the Plan was amended, in part due to strong political interest to develop an OHRV trail on Nash Stream. A nine-mile section of trail known as “West Side Trail” was added to Nash Stream which allowed OHRVs to enter onto Nash Stream from Stratford and make a loop and exit Nash Stream.

Since then, OHRV use has grown significantly in popularity and has become a major economic driver in the North Country. New Hampshire now has one of the largest OHRV trail networks in the nation.

The Plan is currently being re-written. During this process, a technical team (the “Technical Team”) has been formed to help update the Plan (the “Revised Plan”). The Technical Team is comprised of state employees from various organizations with diverse backgrounds and areas of expertise. There is also a citizen’s advisory committee (the “Citizens Committee”) that makes recommendations on the management of Nash Stream.

One of the many decisions that need to be made while updating the Plan is the aspect of OHRV use. This continues to be one of the most challenging questions to be answered before the Revised Plan can be completed. As OHRV use has gained popularity, there have been several additional requests for new trails, resulting in a new pilot trail, known as “Kelsey Notch Pilot Trail”, in the north section of Nash Stream. As continued requests for further expansion continue to come in, DRED has decided to look at all the requests more holistically to make a decision based upon trails for the entire Nash Stream property, while examining the original conservation intent of why Nash Stream was acquired. The Technical Team asked the OHRV community to look long term at what they would like on Nash Stream (as well as other user groups). Two proposals came in to DRED, the first one has been rescinded, and a second, more modest proposal was submitted this spring.

DRED is presenting CORD the following three options, and we are looking for feedback regarding the options. Since CORD has the oversight responsibility over the LCIP purchased properties, and given that Nash Stream is the largest LCIP funded project, DRED is seeking advice and consultation before moving forward with the draft Revised Plan. While the Kelsey Notch Pilot Trail was already reviewed by CORD in 2013, DRED is asking that CORD look at all the potential options together and determine if one or all of these are consistent with the LCIP funding that helped acquire Nash Stream. As is consistent with DRED’s

long management practice of state resources, any decision regarding conservation, recreation, or land management are based on the resources, conservation goals, and public interest of the property.

Option 1: Status Quo

- No new OHRV trails within Nash Stream.
- Continue the Kelsey Notch Pilot Trail
- Continue to allow the West Side Trail.

In 2013, a new section of snowmobile trail was opened to use by OHRV's as a pilot project in Kelsey Notch. The purpose of the Kelsey Notch Pilot Trail is to allow an east-west corridor as part of the Ride the Wilds project and complete the 1,000 mile interconnecting network. This option will allow for the continued use of both the West Side Trail and the Kelsey Notch Pilot Trail. The Kelsey Notch Pilot Trail would be maintained as a pilot trail for a determinate amount of time, and made into a designated trail upon suitable completion of a set of pre-determined conditions. The Technical Team assessed the trail for the coarse and fine filter criteria in November, 2015.

Option 2: Keep OHRV use consistent with 2002 Plan amendment

- No OHRV expansion beyond the West Side Trail.
- Eliminate the Kelsey Notch (pilot) Trail.

Since the acquisition of Nash Stream, the focus of recreation has been on low impact. The Plan called for no motorized wheeled vehicles. This vision for recreation will be carried through to the Revised Plan and will continue to focus on traditional, low impact, recreation. OHRV use was never intended to be a major component of the recreation portion of the Plan. In 2002, the Plan was amended to allow for a three to five year pilot on the West Side Road (the West Side Trail Pilot"), which created nine miles of trail on Nash Stream connecting to the North Stratford trail system. During the West Side Trail Pilot there was a significant amount of oversight as well as various studies completed to understand the effects of OHRVs on many factors, including noise studies, water quality, bird studies, invertebrates, etc. After studying the effects of the West Side Trail Pilot, the Commissioner of DRED adopted the trail as a designated ATV trail – West Side Trail, in 2007.

Option 3: Expansion of the OHRV trail system

- Create an East/West Corridor Trail in the southern portion of Nash Stream
- Continue to allow the West Side Trail
- Adopt the Kelsey Notch Pilot Trail as a designated ATV rail – Kelsey Notch Trail
- Allow a southern connector from the existing West Side Trail down to services and connection to the new east/west corridor.

The North Country OHRV Coalition has come forward with two different proposals; the Coalition first requested that all of the roads in Nash Stream be opened to OHRVs, the second was a significantly scaled down and more modest request. This second proposal requests a connection from the existing West Side Trail down the main road to connect to gas and services, and then heads east out the Amos Emery Road. Sections of new trail would have to be built across Nash Stream where currently no roads/trails exist to connect off Nash Stream to the east.

Limited OHRV use is currently permitted on Nash Stream. Surrounding Nash Stream is the 1,000-mile "*Ride the Wilds*" OHRV system which offers large scale riding opportunities to the immediate east and west of Nash Stream. The "*Ride the Wilds*" could benefit from an east-west trail connector to allow riders on either side of Nash Stream to access the trails on the other side.

The North Country OHRV coalition also requested two parking areas within Nash Stream. These have been eliminated from the proposal. The East/West Corridor, as proposed, is to be a through trail in order to get from one side of Nash Stream to the other. Nash Stream is not meant to be a destination for OHRVs, so for this reason the parking areas have been eliminated.

Review by the Technical Team:

DRED administration has not come to a decision regarding the proposals to date, and is waiting for feedback from CORD, the Citizens Committee, and the public. The Technical Team has been working on re-writing the Plan for approximately three years. During this time, they visited every aspect of the Plan and had many discussions regarding the original vision and management principles as well as looking at the Easement. The Technical Team has concerns about Option 3 based upon the following review:

The proposed East/West Corridor was walked by the Technical Team on July 28, 2016. There were representatives from many state agencies, including Forests and Lands, Natural Heritage, Trails Bureau, Fish and Game and the Office of Energy and Planning. The proposed East/West Corridor was evaluated according to RSA 215-A:43. During the field visit, the coarse and fine filter criteria were examined; however, there are elements of the criteria that need to be evaluated on GIS and at a higher level than the Technical Team. The proposed East/West Corridor can be broken down into four sections: The first is along a gated, gravel road known as the Amos Emery Road. The second section breaks off from the gravel road and follows the Cohos Trail, and then follows an old woods road down to Rowells Brook. The third section follows the boundary line through undeveloped woods and would require new trail construction. The last section re-connects to the Cohos Trail down to the town road.

Some concerns regarding the proposed trail were brought up during the site walk. Fish and Game has reservations about the increase in traffic along the Amos Emery Road. This is a prime beech ridge for black bears. Beech nuts are a significant food source for bears and this area contains numerous "bear trees", or trees that bears repeatedly climb for nuts. Currently, the Amos Emery Road has a locked gate with little to no traffic, which allows the bears and other wildlife to feed relatively undisturbed during the spring and fall. Fish and Game was also concerned about the third section of trail which would require new construction through an undisturbed, un-fragmented spruce-fir forest which provides ideal habitat for martin, bobcat and lynx. There was also a hardwood forest with boulders and rocks outcrops that would be ideal denning locations for multiple species.

The Technical Team also has concerns regarding the length of shared use between the Cohos Trail and the proposed East/West Corridor. There would be several miles of shared use which would present user conflicts. The southeast corner of Nash Stream has always been an area with numerous hiking trails coming in from the Christine Lake area. The Summer Club trail is a historic trail which has been in existence since the early 1900's and the Potter's Ledge trail has been used since the 1880's. There are trails that lead to the Percy Peaks, Victor Head, Bald Mt. and Potter's ledge, which would be affected by the addition of OHRV traffic to a very remote, quiet part of Nash Stream, which is currently quite secluded.

There was some discussion about the beginning of the road on the abutter's property. The property has been under the same ownership for a long period of time, but the property may change hands as the owner is in the process of divesting a portion of his holdings. In addition, while the State has a right-of-way across his property for forest management, it is unclear if this right-of-way allows the public to cross his property. The land owner has always allowed the snowmobile trail access across his property and he has agreed to allow OHRV crossing as well, however, if the trail goes through it will need to be reviewed as a permitted use of the right-of-way.

There were no rare plant species or exemplary natural communities documented within the proposed East/West Corridor. However, a wooded talus community on the southern slope of Bald Mountain, immediately adjacent to the proposed trail, appeared to be of high quality. Additional field work would be necessary to determine if this community is exemplary.

There were some discussions regarding a few sections of the proposed trail which were steep. One section in particular was an old trail that was steep and gullied, which would likely lead to erosion. Another section on concern was steep and angled toward a stream, which has the potential for runoff directly into the brook. There were significant rocks and boulders and ledge in areas. The logistics of trail construction and maintenance through parts of this area would result in significant impact to Nash Stream.

Lastly, we had a discussion about the south connector that would lead from the existing West Side Trail to the proposed East/West Corridor. This portion of trail would travel along the Nash Stream Road which is the main access into Nash Stream. This gravel road is open to motor vehicle traffic to allow public access. It would be difficult to install a gate in this area to prevent OHRV traffic from traveling onto the rest of Nash Stream.

Expanding the OHRV trails to the main road and the Amos Emery Road would lead to an increase in maintenance and could conflict with forest management activities in the future. Though there is limited riding allowed on Nash Stream today, the majority of the Technical Team had concerns that further expansion of OHRV use was not consistent with the management vision or the purpose for why Nash Stream was originally acquired.

New Hampshire Council on Resources and Development

NH Office of Energy and Planning
107 Pleasant Street, Johnson Hall
Concord, NH 03301
Phone: 603-271-2155
Fax: 603-271-2615



TDD Access: Relay NH
1-800-735-2964

December 14, 2016

Brad W. Simpkins, Director
New Hampshire Division of Forests and Lands
NH Department of Resources and Economic Development
Brad.Simpkins@dred.nh.gov

Chris Gamache, Chief
NH Trails Bureau
Department of Resources and Economic Development
Division of Parks and Recreation
Christopher.Gamache@dred.nh.gov

Dear Director Simpkins and Chief Gamache:

On December 8, 2016 the Council on Resources and Development made several decisions regarding ATV trail use in Nash Stream Forest and whether such use is consistent with the principles set forth in RSA 162-C:6 for management of LCIP lands.

Concerns about the establishment of the two existing Nash Stream ATV trails – West Side Trail and Kelsey Notch Trail – were brought to the Council's attention by the Appalachian Mountain Club, the Society for the Protection of New Hampshire Forests and The Nature Conservancy in a letter dated May 5, 2016.

In response, the Council adopted the enclosed Findings, which includes General Findings for any ATV use in Nash Stream Forest, as well as Findings specific to West Side Trail and to Kelsey Notch Trail.

In addition, the Division of Forest and Lands submitted a Nash Stream Forest OHRV Briefing Paper and requested guidance from the Council on three proposed ATV trail options for

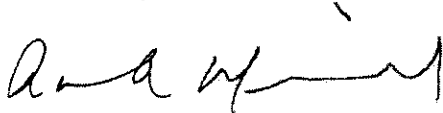
inclusion in the 2016 revision of the Nash Stream Management Plan. The Council's guidance is based on consistency with the principles of RSA 162-C:6 for the management of LCIP lands.

The Council determined that both Options 1 and 2, as proposed in the Briefing Paper, are consistent with the principles set forth in RSA 162-C:6, with West Side Trail and Kelsey Notch Trail each subject to the specific conditions outlined in the Council's December 8, 2016 Findings. The Council further determined that Option 3, as proposed in the Briefing Paper, is not consistent with the management vision for Nash Stream Forest nor with the principles set forth in RSA 162-C:6.

The Council's motion regarding the proposed options for the Nash Stream Management Plan is enclosed at the end of this document.

Please be in touch with questions or concerns.

Best wishes,



Amanda A. Merrill
Director, Office of Energy and Planning
Chair, Council on Resources and Development

cc: CORD Members
 Jeffrey Rose, Commissioner, Department of Resources and Economic Development
 Phil Bryce, Director, Division of Parks and Recreation, DRED
 Christopher G. Aslin, Assistant Attorney General, Department of Justice
 Susan Arnold, Vice President for Conservation, Appalachian Mountain Club
 Matt Leahy, Public Policy Manager, Society for the Protection of New Hampshire Forests
 Jim O'Brien, Director of External Affairs, The Nature Conservancy
 Will Abbott, Vice President for Policy and Reservation Stewardship, Society for the
 Protection of New Hampshire Forests
 Larry Gomes, Nash Stream OHRV Task Force

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FINDINGS REGARDING ATV/UTV USE IN NASH STREAM FOREST **ADOPTED BY CORD ON DECEMBER 8, 2016 (8-0)**

General Findings:

The Council finds that in order to perform its statutory duty to manage LCIP lands, members must review and find that any use of ATV/UTVs, as currently defined by statute, within Nash Stream Forest is consistent with the principles set forth in RSA 162-C:6 prior to implementation.

CORD further finds that any ATV/UTV use in Nash Stream Forest must be limited to specific ATV/UTV trails approved by CORD in advance. In order to be consistent with the principles set forth in RSA 162-C:6, CORD finds that each proposed ATV/UTV trail must meet the following conditions: (1) the trail must be designed, sited, and used so that it preserves and does not adversely impact natural resources and conservation attributes of the property and does not interfere with or detract from the other uses of Nash Stream Forest; (2) the trail must be authorized in a current management plan, which has been reviewed by CORD for consistency with RSA 162-C:6 and has had appropriate public and state agency input; (3) the trail must comply with the requirements of RSA 215-A and all other applicable ATV/UTV and environmental regulations and standards, and the state's most recently adopted best management practices for trail construction and erosion control; (4) after construction, the trail must be continually managed to protect natural resources and conservation attributes and to limit interference with other uses of Nash Stream Forest; (5) CORD must be adequately informed on an ongoing basis of the status of management, maintenance, and enforcement efforts related to ATV/UTV use, as well as impacts of ATV/UTV trails on the Nash Stream Forest; and (6) CORD reserves the right to periodically reassess whether ATV/UTV use in the Nash Stream Forest, or on any of the trails therein, remains consistent with RSA 162-C:6 and reserves the right to temporarily or permanently close trails if necessary as circumstances change over time.

West Side Trail:

The Council finds that the use of ATV/UTVs on the West Side Trail, as currently managed, is consistent with its management obligations under RSA 162-C:6 as long as: (1) the memoranda of agreement required by RSA 215-A:42 relating to monitoring, maintenance, and enforcement

remain up-to-date and contain sufficient detail and safeguards to ensure that the trail is maintained in a safe and environmentally appropriate manner; and (2) conditions and use of the trail do not change in such a way that makes continued use of ATV/UTVs on the West Side Trail inconsistent with the requirements of RSA 162-C:6 as determined by CORD.

Kelsey Notch Trail:

The Council finds that, based on current available information, it is not able to determine at this time whether continued use of ATV/UTVs on the Kelsey Notch Trail is consistent with CORD's management obligations under RSA 162-C:6. In order to assist in this determination, CORD requests the following additional information regarding the use, maintenance, and impacts of ATV/UTVs at this location:

1. By the January 12, 2017 CORD meeting, DRED shall submit to CORD for review the following:
 - a. An updated coarse and fine filter analysis of the Kelsey Notch Trail, pursuant to RSA 215-A:43;
 - b. An interagency memorandum of understanding, pursuant to RSA 215-A:42; and
 - c. Written agreements between DRED and a local ATV/UTV club, pursuant to RSA 215-A:42.
2. At such time that CORD has reviewed the information above and determined that it is sufficient for the Kelsey Notch Trail to provisionally re-open for ATV/UTV use, DRED shall then submit the following to CORD for review as they become available:
 - a. The annual reports required pursuant to the interagency memorandum of understanding; and
 - b. Such additional reasonable and appropriate studies, data, and information as CORD may require to adequately assess whether the continued use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6.
3. CORD will assess this additional information for three years (beginning in 2017) and at the end of this time period, or at any other time as circumstances dictate, CORD shall determine, based on available information:
 - a. That additional information and assessment is necessary to determine whether the use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6; or
 - b. That use of ATV/UTVs on the Kelsey Notch Trail is consistent with RSA 162-C:6, subject to the general conditions for any ATV/UTV use in Nash Stream Forest; or
 - c. That ATV/UTV use on the Kelsey Notch Trail is not consistent with RSA 162-C:6 and the trail shall cease to be open for ATV/UTV use.
4. During the pendency of CORD's review of the Kelsey Notch Trail no expansion of the area of disturbance for ATV/UTV use shall be permitted without prior CORD approval.

**MOTION ON GUIDANCE TO DRED REGARDING ATV TRAIL OPTIONS
FOR 2016 REVISED NASH STREAM FOREST MANAGEMENT PLAN**

“In looking at the three options presented to CORD from DRED, and given the preliminary findings of the Technical Team, Option 3 would not be consistent with both the management vision as well as RSA 162-C:6. Both Option 1, keeping the status quo, and Option 2, keeping OHRV use consistent with the 2002 Management Plan amendment, would be consistent with both the management vision and CORD’s LCIP responsibilities. However, Option 1 needs to reflect CORD’s determination earlier in today’s meeting.”

**Adopted by Council on Resources and Development (7-0)
December 8, 2016**

Guinn, William

From: Liz Freierman <elizabeth.osberg.clark@gmail.com>
Sent: Friday, March 03, 2017 6:58 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest public comment

To Whom It May Concern,

I am writing to voice my concern about allowing ATVs access to the Nash Stream Forest. I hiked the Cohos Trail this past summer. While the Northern parts of the trail were beautiful, the main thing I remember about that part of the trail was the almost constant noise, smell, and commotion caused by passing ATVs. It was a relief to move further south along the trail where the trail was only used by hikers. Nash Stream seemed like the boundary between these two parts of the trail experience. In my mind it stands out as a quiet and beautiful forest filled with countless streams. I would hate to think that future hikers might not be able to enjoy that welcome quiet.

It is a totally different experience to walk on a trail that is used by motorized vehicles and one that is just for foot traffic. In my experience ATV trails tend to be wide (which makes them inherently less interesting and enjoyable for a hiker), dusty, and can be very busy during the summer. I think that I would spend a lot less time hiking if more trails were used by motorized vehicles.

I have nothing against ATVers (we even received a bit of trail magic from a couple of them this summer), but the Nash Stream Forest is a beautiful spot and ATVers have a lot of trails throughout this region. Please keep Nash Stream Forest for the hikers!

Thank you for your time.
Sincerely,
Liz Freierman

Guinn, William

From: Gary Newfield <gnewfield@yahoo.com>
Sent: Friday, March 03, 2017 8:33 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Draft Master Plan

I would like to make a few comments regarding regarding 10.3.4 ATV and UTV Use:

I am in favor of limiting ATV/UTV use to their current status of the West Side Trail and temporary conditional use of the Kelsey Notch Trail. If the Kelsey Notch trail does not meet the specifications for DRED and Fish and Game noted in the management plan(adequate resources to monitor, maintain, and enforce the laws) then the trail should be closed.

My concerns are that ATV's unlike snowmobiles and hikers are more likely to bring in invasive species. They are by their very nature noisy, disruptive, and contribute to trail degradation and erosion. The machines contribute to noise pollution which is anathema to the original management plan that calls for preserving the natural beauty, ecological values, landscape, rural character, natural resources and the quality of life in NH. Someone hiking or walking the trails should not be subjected to the noise of these vehicles if that person is visiting the area for quite contemplation/solitude. Noise by its very nature can be invasive.

I am also concerned we have not completed a comprehensive economic study of ATV/UTV use in NH. What are the costs associated with law enforcement for Fish and Game, State police, and local law enforcement officers, the costs associated with rescues, accidents etc. What are the costs of maintenance for the trails and who is paying? Do the clubs maintain all their trails with no support from the state? How much time do Fish and Game officers spend dealing with ATV's/UTV's and how is this affecting other duties they may have to be responsible for? Do we have enough personnel to adequately and safely police the trails we have? If not, then it would be foolish and detrimental to be opening more trails @ this time. What are the economic benefits of OHRV use versus non-motorized recreation? Which of these activities contributes more to the economy of NH? I have heard the head of Fish and Game state wildlife watching now brings in more money to the state than hunting and fishing licenses. And I understand statistics show there are far more people who hike, bike, walk, view wildlife, birds, etc than the 30,000 or so OHRV users noted by DRED.

Any management plan should also take into consideration Global Warming due to the burning of fossil fuels. There is overwhelming evidence the burning of fossil fuels is contributing significantly to the warming of the planet. We have been witnessing unprecedented record warming which is affecting our winters and we need to take into account promotion of activities which would exacerbate this problem. Any decisions made regarding the management plan should rely upon the best science available at the time, not political considerations.

Sincerely,

Gary Newfield

Guinn, William

From: Peggy Smith <plskayak@gmail.com>
Sent: Sunday, March 05, 2017 9:41 PM
To: DRED: Nash Stream Plan
Subject: Nash Stream Forest Plan Revision Comments

Nash Stream Forest Plan Revision Comments
From Peter Riviere, Lancaster coosrivers@gmail.com

It was stunning to re-read the original, seminar NSF Management Plan in preparation to review the revision. Not only was it the creation of some of the best, and most diverse minds in the state on model, forest management it truly was a model of what's best for the forest and not other more exigent pressures being brought to bear on continuing the abusive forestry practices witnessed there for decades.

It was then disheartening to see the cavalier deletion of many of those same ecologically-based tenets in this revision. Imagine my shock when Mr. Simpkins, at the Whitfield public input session, introduced his abbreviated synopsis of the revision with the lead bullet being a return to wood harvesting as a primary goal of the new plan.

I would urge suspension of this draft revision of the 1995 NSF Management plan until such time as a comprehensive review by the full Advisory Committee and a newly organized Tech Committee complete and vet a proposed revision; that 20 year studies as outlined in the 1995 plan be documented and included; that Climate Change conditions be addressed; expansion of ATV usage and accompanying trail building be suspended until studies on the impact (environmental, economic, and impact on intrinsic values of a quiet forest) be documented, completed and analyzed; and that some rationale be offered and supported for changing the very nature and tenor of the original plan specifically why timber harvesting and even-age management practices have been made the forefront of the management plan.

I offer as concerns the context of the original '95 plan that wholly recognized the forest had been hammered by the previous owner/s for fiber extraction over numerous decades and would need considerable time to grow and heal from those abuses. Several terms oft repeated in the 1995 plan was "it would take decades to restock the NSF"; and that "growth would greatly exceed extraction for years to come". Even-aged management was a low priority harvesting technique and then only on the condition that it be used to achieve desired ecological outcomes. Clearcutting as a management tool to aid timber production was a low priority if included at all. We now hear from DFL Director B. Simpkins that wood supply is a primary objective of the plan.

What has happened to this being a model of state ownership under stringent ecological and conservation easement strictures? Is our memory so short and our forestry background so shallow we have abandoned these lofty goals? Or have political and economic conditions changed so dramatically that NHDFL has offered this sop to the biomass industry and the ATV community in hopes no one would notice or care that a vaunted, model management document had been eviscerated by convenience and limited authorship by the same staff that will manage the tract. Is this really what LCIP funded with its multi-millions in partially purchasing the tract or that the USFS was signing on to a future of shoddy, run of the mill management plans for their expensive Conservation Easement? I think not. Before this plan is rushed to the printers for codification perhaps a review from both those bodies would be a prudent step instead of this hurried affair.

What is most perplexing is that DFL's university trained foresters who penned this draft could so blithely ignore Climate Change and the need for carbon sequestration as a hedge against worsening climactic conditions. Clearly NH's Renewable Energy plans have proven toothless as the state continues to support biomass energy plants and even considers biomass to power generation industry a "carbon neutral" operation. New research from the esteemed British ecological entity Chatham House has debunked the theory that burning trees is more carbon neutral than burning other fossil fuels (Reported in the Times of London on Feb. 23, 2017).

Locally there is no larger culprit than the Cate Street/Burgess biomass plant in Berlin that consumes 1 million tons of wood chips to make an 300,000 tons of energy. The technology for these thermo/turbine plants (no matter what fuel is used) remains archaic and the plants are at best 30% efficient with 70% of the potential energy discharged to the air or water as thermal energy. Imagine the economic boost to the City of Berlin (pop 7,800) if that energy were captured in the form of heat supplied to all inhabitants, businesses and institutions in the form of district heating. I'd suggest the benefit from more ATV use and harvesting NSF wood products would pale by comparison and truly a win-win in the Climate Change realm.

Economically the so-called wood products harvested to fire these plants are no boon to the economy as the cost per ton paid for the chips remains about what it was when logging was suspended in NSF in 1995.

On the ATV usage front, when is enough mileage enough for these enthusiasts? Already Coos hosts the 1,000 mile Ride The Wilds interconnected system. As i testified in the Whitfield Public Hearing many conflicts have arisen with disrespectful riders disturbing the peace in previously remote, tranquil homestead and forested areas of the region; OHRV riders have confronted motorists on shared roads and speed limits are widely exceeded by riders. Not all are visitors/outsideers who might not share the same respect for the land, the rules and the neighbors over whose land they travel.

As to enforcement, Fish and Game is so overwhelmed by more and more human frailty on hiking trails, snow machine trails and supposed frozen water bodies and from ATV incidents as to make enforcement hit or miss or non-existent or so untimely as to be a produce a recreation Wild West. With their numbers static for decades thanks to the success of the small government gang controlling an ever shrinking NH state government can we

expect more than minimal enforcement of a more lawless crowd of enthusiasts? Is this the model of economic development salvation in which DRED asks us to place our faith? Thanks but no thanks I'd rather scrimp and save and live in tranquility.

Is this really the best we can do as a follow-up to an spirited and inspired model management plan penned after hours, weeks and months of collaboration by an invested and empowered tech team and citizens committee. Replacing the original plan with this underwhelming and conflict-rich effort is a black eye on DRED, NHDFL and the State of New Hampshire and a face lap to those who helped develop the original plan.

Peter Riviere
1 Mount Prospect Road
Lancaster 03584
coosrivers@gamil.com
603-631.0217

Guinn, William

From: Susan Percy <spercy@smartcfs.org>
Sent: Wednesday, March 08, 2017 11:22 AM
To: DRED: Nash Stream Plan
Subject: Nash Stream
Attachments: Nash Stream.docx

Attached is my objection to adding a trail for ATV use through the Nash Stream Forest. We can find another route that won't despoil this beautiful Forest.

Thank you.
Susan Percy

Susan E Percy
275 Summer Club Road,
Stark, New Hampshire

March 1, 2017

Brad Simpkins, Director
New Hampshire Department of Resources and Economic Development

Dear Director Simpkins,

I write to urge you to protect New Hampshire forests from the increasing encroachment of industrial use. I am specifically concerned with the possibility that the Nash Stream Forest would be subject to an ATV trail that would forever mar its current status as an unspoiled and beautiful protected forest.

The trails through the Nash Stream Forest offer the hiker the quiet enjoyment of the North Woods. While it has become increasingly normal to pass other visitors to the Forest, their use is compatible with exploring and enjoying nature in quietude and reflection. It is a "walk in the woods" and occasionally the exertion of a fast hike!

Other areas are well developed for ATV use already. Jericho Mountain has been forever altered because of ATV use. The scenic nature of Route 110 through Jericho has been replaced with great swaths of dirt trails.

The town of Stark has approved the use of the Percy Road as a connector to Groveton. There is no compelling reason to put a trail through a place as special as the Nash Stream Forest. The impact would be far too great on an area that so many have sought to protect through the years, including, importantly, DRED.

Keep the "Great" in the North Woods of New Hampshire. Deny the request to permit ATV access through the Nash Stream Forest.

Kind regards,

Susan E. Percy

Nash Stream Management Plan

2017

Mail Comments

Jay Espy
28 Salt Brook Road
Freeport, ME 04032
jay.espy@gmail.com

January 16, 2017

Jeffrey Rose, Commissioner
NH Department of Resources and Economic Development
172 Pembroke Road
Concord, NH 03301

Dear Commissioner Rose,

I am a member of the Percy Summer Club of NH and have been a camp owner on Christine Lake in Stark since 1991. I attended the public meeting of the Nash Stream Forest Citizens Committee in Lancaster on December 14, 2016 and am writing to provide some history concerning conservation efforts undertaken by the Percy Summer Club (PSC), John M. Kauffmann, the Society for the Protection of New Hampshire Forests (SPNHF) and the Department of Resources and Economic Development (DRED) in connection with the State of New Hampshire's acquisition of Nash Stream Forest.

First, I should state that I am opposed to any additional ATV/OHRV use within Nash Stream Forest. Having been a part of the planning effort to conserve lands around Christine Lake for the purpose of complementing the State's purchase of Nash Stream Forest and protection of this unique watershed, I believe that use of ATV's is in direct conflict with the original purposes envisioned and agreements made at the time.

In 1987, when the Land Conservation Investment Program (LCIP) was created by the state, John Kauffmann, then a member of PSC, proposed the idea of granting a conservation easement on PSC land to protect the remote, mostly-undeveloped and quiet nature of the lake. He recognized that Christine Lake was a unique resource – a deep, cold, clear lake with a forested watershed and view shed that remain virtually fully intact. Outside of the White Mountain National Forest, this is likely the largest remaining watershed of its type in the State. John realized that if he, the State, PSC and SPNHF worked together, the opportunity existed to protect this rare resource for all New Hampshire residents and visitors.

John and his family had previously acquired lands adjacent to PSC and Nash Stream Forest over the course of many decades. As he began discussions with members of PSC, he also began working with SPNHF to draft conservation

easements that he planned to donate if easements could be secured on the PSC property surrounding Christine Lake and on the 40,000-acre Nash Stream tract the US Forest Service and the State were negotiating to secure through easement and acquisition from Rancourt Associates.

Late in 1988, the US Forest Service was persuaded to acquire a conservation easement on the Nash Stream tract. This was the first federal easement of its kind anywhere in the nation. This easement required the State to develop a long-term management plan for the forest. John and PSC then began discussions with DRED and SPNHF to develop a sustainable and aesthetically acceptable management plan for the property. John and PSC agreed to grant a conservation easement conserving their holdings on the condition that the State develop a management plan compatible with this vision. Fortunately, DRED (under the leadership of Steve Rice) agreed with this vision and created a plan that sought to protect soils, water quality, views, forest diversity and quiet enjoyment of the lake and surrounding forest. Forest harvesting would be conducted in a manner that would protect these values rather than maximize production or disturb the natural surroundings.

The original 1995 plan prohibited ATV/OHRV use on the property. Although one connector trail on the West Side Road was allowed in 2002, adding additional trails for this purpose would certainly not be compatible with the management plan agreed to by the parties. The impact of ATVs on soils, water quality and, most importantly, the quiet use of the lake and surrounding lands, including numerous hiking trails, are clearly outside of the parameters agreed to at the time or compatible with existing and historic uses.

In 1990, John Kauffmann voluntarily agreed to forgo substantial future monetary value from his land by granting conservation easements on 290 acres. PSC followed suit in 1991, granting a conservation easement on its 374 acres surrounding all but a 200-foot strip at the end of the lake that was already in State ownership. With these donations, the entire lakeshore was conserved for the enjoyment of the public. These voluntary acts were made in good faith with the belief that the State would uphold its end of the bargain in ensuring that Nash Stream Forest would be managed as a working forest employing exemplary forest harvesting practices and as a remote, wild recreational resource.

John and SPNHF continued their efforts to protect this remarkable watershed and its surrounding woods and trails by acquiring and donating additional lands through SPNHF. Today, more than 2,000 acres of forestland, managed for its recreational, ecological and productive values constitute SPNHF's Kauffmann Forest.

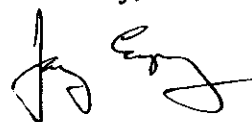
The vision of those who created the Nash Stream Forest and protected adjacent lands around Christine Lake and on nearby hills and mountains is paying increasing dividends today. During the past two decades, the Coos Trail has been developed, bringing increasing numbers of day hikers and through hikers to the area. Kayaking and canoeing visits to Christine Lake have increased dramatically in

recent years. I see numerous groups of kayakers each day that I am in residence on the lake during the summer. The number seems to be growing with more local outfitters recommending Christine Lake as a paddling destination. With efforts made by PSC to keep the beach on the east end of the lake clean and safe, with increasing numbers of families visiting the beach for swimming and quiet recreation. The parking lot at the beach is also seeing increasing use by hikers accessing the woods road that leads to the Coos Trail and adjacent side trails. There are many days now that the parking lot is completely full.

Mention was made at the public Citizen's Committee meeting on December 14 that the Coos Trail could be moved to accommodate both hikers and ATV riders. I disagree with this assessment. The Coos Trail traverses the course it does because of the unique resources available in the southern portion of the Nash Stream Forest. From the Percy Road, the Trail crosses between Long and Bald Mountains and in front of Victor Head where an historic and well-maintained side-trail leads to the summit. From the summit of Victor Head, spectacular views to the Mahoosuc Mountains in Maine, the peaks of the Pilot Range and the Connecticut River valley are visible. From Victor Head, the Coos Trail traverses the course of the old Summer Club Trail, a trail used by PSC since at least the early 1900s. This trail is now enjoyed by thousands of hikers each year. Impacts associated with use of ATVs in this section of the Nash Stream Forest would not be limited to incompatible trail beds. The noise from ATVs, motocross trail bikes and other motorize wheeled vehicles would fundamentally alter the wild and remote nature of the experience for all other recreational users. Additionally, use of such vehicles would create problems associated with soil erosion as well as incursions on sensitive natural areas and wildlife. These impacts are simply incompatible with the original vision and agreements struck by those who worked hard and made significant personal and financial sacrifice to ensure that Nash Stream Forest would stand as an exemplary forest resource for New Hampshire.

As a former member of the Nash Stream Forest Citizen Committee (in the early 2000's), a camp owner and someone who hikes and maintains the trails in this region and helps keep the Christine Lake beach and surrounding lands clean for all visitors, I ask that you and your colleagues please not permit an incompatible use that will deny the intent of good faith agreements made and, most importantly, forever change the nature of this unique place.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Espy". The signature is stylized and cursive, with a large initial "J" and "E".

Jay Espy

RECEIVED

FEB 06 2017

D.R.E.D.

02/02/17

Dear Director Brad Simpkins,

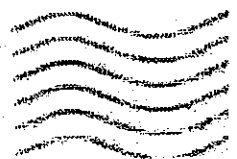
As an avid day hiker & backpacker I'm concerned with new development of ATV & OHRV trails in the Nash Stream Forest. I understand that there are already existing Ride the Wild trails there. Are we to riddle the entire area with manmade land eroding machines? Walking connects one with all aspects of outdoor life. The strength needed to ascend these mountains on foot, creates a fresh reverence for our Earth. We are blessed with abundant wildlife. Much of which I only hear, because even my walking is an invasion. I know where they live. I scout for tracks, scat, not to hunt them, but to become aware of who I'm sharing these woods with. Do ATV & OHRV know who is with them? I know there are those, even some hikers who only wish to "conquer" these mountains. It is a source of our economy here. One which is important, however I fear if we're not careful we'll lose what we value most, our wildlife, our clear unpolluted streams, our chance to breath clean air. Please be mindful. Hopefully with careful planning there will be a managed trail system that fits the needs of all who use this wilderness.

With much interest,

Joy P. Sherman

JOY SHERMAN
678 Presidential HWY
Jefferson, NH 03583

WHITE RIVER JUNCTION
VT 050 1 T
04 FEB 2017 4 PM



Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

February 12

Dear MR. Simpkins,

To all involved in Nash Stream forest
I Crystal Sturgeon am writting to
Express my support for A.T.V. usage
in Nash stream. I am OHRV owner,
our family uses said Area & trail
to acess milan and further towns
Via the trail through stark, I
feel it is important for the economy
& Tourism. for surrounding towns.
my hopes are that trail will be
Kept operational for all A.T.V. usage.

Thank you for your consideration
and time.

Crystal Sturgeon,
Crystal Sturgeon
NH, Resident and
OHRV. owner.

Dear Mr. Simpkins,

RECEIVED

February 14, 2017

FEB 21 2017

D.R.E.D

I am writing this Letter to express my support and concern for the Trail and Access via the Nash stream forest.

Said passage and trail are an important and vital link for the towns of Groveton to Stark and on to Milan & Berlin.

We the A.T.V. community and Business owners and potential Powersports entrepreneurs (as many are associated with) have become Reliant on access through Nash stream. We ask for continuance and ask of the Nash stream Citizens Committee and all involved with the preservation of N.S.F. Please review Usage for A.T.V.'s and consider future access. Snow machines emit More C.O.₂'s than cleaner running four stroke O.H.R.V.'s and I understand there is "Less" of a Ground Impact, Damage and Wear, with that understood I feel it is imperative that the O.H.R.V. issue be resolved.

Powersports industry has helped Tourism "limp" along in Coos County. We feel if this is to change or become "limited" it could further limit the already fragile economic future of Coos County and Potential Powersports Tourism that has "taken" hold in areas where "Ride the Wilds" Trails have been created. I have family & friends that support all Powersports that live in Coos and believe it has been a Benefit Not Detriment for the North Country! Please consider my letter and other's Responses for the actions of "some" O.H.R.V. users that have been Careless and irresponsible.

Please do not accept the actions of few to be a deciding factor in the continued usage of N.S.F. I beg of the Committee a continuance of the trail. Thank you.

Yours sincerely,
Shawn H. Waddington
Shawn Waddington
of Tilton N.H.

RECEIVED

FEB 15 2017

D.R.E.D

Normand Roberge

1156 West Milan Road

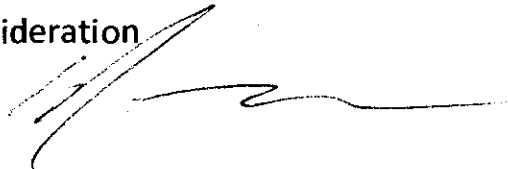
Milan N.H. 03588

To Director Brad Simpkins

As the owner of Gord's Corner Store in West Milan and someone who has invested substantial funds getting the ATV trail to my business I can tell you it's been a life saver for my wife and I keeping our business afloat. But above my obvious financial stake in the growth and prosperity of the ATV/UTV economy of the North Country my feelings as a New Hampshire tax payer and outdoor guide are stronger as it pertains to future trails in Nash Stream. For starters there were never any laws or covenants prohibiting ATV use in Nash Stream and one of the initial stated goals for this State Forest was to insure public access for recreation. The nineteen thousand NH residents who register OHRV's in this state should have their place in this State Forest and the amount of space we are asking for is minute and does not disturb the core of this property. The combined footprint of existing and proposed ATV trails for Nash Stream will amount to 70.7 acres or a quarter of one percent of the entire Nash Stream forest. All I can say as a N.H. taxpayer is "Give me a break" people in this country are sick and tired of being locked out of public lands. If we were asking for unfettered use of this property I would be dead set against it, but that's certainly not the case here. We are asking for less than a half percent of the total land mass of this State Forest for our recreational use and these trails are on the periphery of the forest not in the core. I hope that your Division will fight for our place in the Nash Stream State Forest.

Thank You for this Consideration

Normand Roberge



gordscorner@yahoo.com 603 449-2236

RECEIVED

FEB 15 2017

D.R.E.D.

William Johnson
113 Back Lake Road
Pittsburg, NH

February 13, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch), I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads.

This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails.

Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,



William Johnson

February 13, 2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

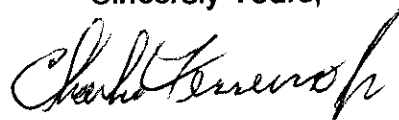
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I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another. Thank you for any consideration you can give this matter.

Sincerely Yours,



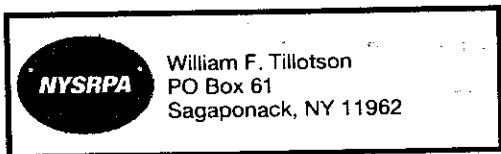
Charles Ferreira Jr
13 Tamar Dr
Goffstown, NH
03045

2/13/17

Dear Mr. Simpkins

Developing The ATV/UTV trail system
in The Nash Stream area would be a
great addition + And attraction to
the North wood of N Hampshire. I come
from New York, Spend money in
New Hampshire - to ride these
trails - The local clubs are doing
a great job. Please work
with them on this.

Best Regards
Bill Tillotson



MID-ISLAND NY 117

13 FEB 2017 PM 2 L

Brad Simpkins
NASH Stream plan
NH Div. of Forest + Land
172 Pembroke Rd

RECEIVED

FEB 21 2017

D.R.E.D.

February 15, 2017

Director Brad Simpkins
Attention: Nash Stream Plan NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. Our family of five, camps seasonally at Connelly Campground in Stratford. Our boys range in age from 3 to 17 and they all LOVE riding the trails. It truly is such a great and fun family sport and we are building so many memories with our kids on the trails. One of our favorite trails is the West Side Trail, which is so peaceful and beautiful to ride on. The kids are always looking for deer or moose as we love and respect the wildlife that lives in the forest.



A new Southern Connector trail is in great need so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. We have several friends with camps in Stark and we love to go visit them but, it is not very enjoyable riding on pavement.

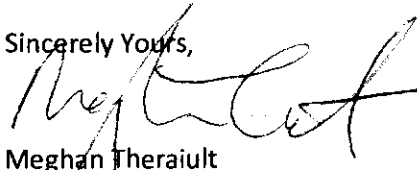
As you know, this land was purchased with public funds and I would hope that it could be opened to all for recreation enjoyment. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.



I was told that several environmental groups want to shut down the ATV trails in Nash Stream Forest and they are also against any new trails. This is very upsetting to me. ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and these riders should be allowed access across Nash Stream Forest for services and to be able to travel from one town to the next. My family and our friends are all very respectful and safe on the trails and understand that it is a privilege to ride on them, so I do hope there will be more trails in the coming years for us to all enjoy.

Thank you for taking time to read this letter. I hope you are able to support the addition of these critical trails for future ATV use.

Sincerely Yours,


Meghan Theriault
162 Mount Delight Road
Epsom, NH 03234



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FEB 21 2017

D.R.E.D

2/16/2017

Director Brad Simpkins

Attn: Nash Stream Plan

NH Division of Forests and Lands

172 Pembroke Road

Concord, NH 03301

Dear Director Simpkins:

I am writing to you in regard to the management of the Nash Stream Forest. As I was unable to attend the public session on the use of ATV's in the Nash Stream, please consider this to be my individual public input on the issue.

As a resident of Jefferson, NH and user of the Nash Stream Forest as a hiker, I am primarily concerned that the State follow their own rules and standards in regard to the potential development of any ATV trails or network in the Forest. The Forest was purchased with public moneys intended for the conservation of New Hampshire's natural heritage and that intent, and the rules inherent in the use of the funds, must be followed.

Secondarily, I am concerned about the unplanned rapid expansion of ATV trails in the North Country, often without proper consideration of the public's broader interests. While I am a proponent of supporting a wide range outdoor recreation, I also recognize that there are conflicts between uses that must be managed in order to provide quality recreational experiences for all and protect the local environment. The notion of 'multiple use' in regard to mixing motorized and non-motorized uses is a false premise as the resource in practicality ends up being 'claimed' by the heaviest and fastest moving user...the motorized recreationist...to the exclusion of the rest for the simple facts of safety...there is a reason we have sidewalks instead of asking pedestrians to walk in the streets! Additionally, the impact of ATV uses is not limited to the trail system as the significant noise created by ATV's creates a much broader area of impact that is unpleasant for all except apparently the user of the machine that generates the noise.

I believe that the ATV community should focus their attention on making the Jericho Park ATV system a world class facility and stop trying to expand their reach to wherever they may imagine it could go. We don't need more ATV trails; we need better stewardship of the existing trails, investment in State resources already focused on ATV use, and recognition that other uses are precluded by the introduction of ATV's on public lands.

I expect that the State will follow the rules and standards for the funds that purchased the Nash Stream Forest, and will also ensure that any expansion of the ATV trail system be compatible with other uses, and the trails themselves where approved meet State standards of layout, construction and location.

Sincerely yours,



Paul Cunha

130 Stag Hollow Road

Jefferson, NH 03583



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2/16/2017

FEB 21 2017

Ammonoosuc Chapter (#554) of Trout Unlimited
224 Grandview Rd.
Littleton, NH 03561

D.R.E.D.

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins:

This letter is written on behalf of the Ammonoosuc Chapter (#554) of Trout Unlimited (TU). Our TU chapter represents about 100 active members living in northern NH and our area of interest encompasses Nash Stream Forest. For many years our chapter members and many others we have recruited have volunteered for countless hours to assist with restoration work and to monitor fish population improvements. On many occasions students from the Lisbon Regional School Panther Adventure and Wildemess Society (PAWS) led by a chapter member/teacher have also assisted NH Fish & Game biologists with their work. This has enabled them, as well as many older adults, to have valuable learning experiences while benefitting Nash Stream Forest restoration efforts. We often use this area to inspire citizens about the importance of our natural environment.

Further comments from Trout Unlimited National:

"As most of you know, the Nash Stream watershed is the location of one of the largest and most successful stream restoration projects in the Northeast. Trout Unlimited has worked with NH Fish & Game and other partners for more than a decade to improve trout habitat in Nash Stream, largely by replacing culverts that blocked fish passage and adding large woody material to streams at a cost of more than \$1.3 million. You can find more detail on the TU Project Finder on www.tu.org by zooming in on the watershed. The restoration is working. Surveys are showing increased numbers of wild trout, and the need for stocking has been greatly reduced.

One of the reasons why Nash Stream was selected for such an ambitious restoration effort was the promise of future protection through the existing conservation easement and a management plan that set out to, 'Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes,' and 'Manage the land with as little interference as possible with natural ecological functions.'

The next Nash Stream Forest Management Plan must protect our investment in Nash Stream restoration in order to sustain a thriving trout fishery. The new management plan provides a

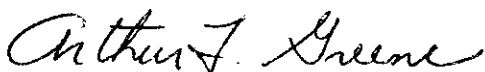
rare opportunity to improve management of streamside areas to promote the health of the trout fishery. The plan should include riparian buffers to benefit water quality, water temperature, and wood recruitment for instream habitat. Under the new plan, the NH Division of Forests and Lands is also considering an expansion of ATV trails in the watershed, which could affect water quality. It's important that Trout Unlimited members are heard during the comment period."

When reviewing the 2017 Nash Stream Forest Management Plan, we have two primary concerns: 1) the sizes of the buffers to restrict timber cutting near riparian areas of all orders of streams, and 2) the use of ATVs in the forest.

- 1) We certainly are aware how past human use of the forest has severely impacted the area by heavy timber cutting and use of the waterways to transport logs. But now climate change is stressing wildlife and plant life as well. We ask that very generous buffers be created between zones of timber harvesting and riparian areas, larger than those in the 2017 Management Plan. The current draft references best practices based on "Good Forestry in the Granite State". Due to the dramatic increase in the effects of climate change on our northern forest we feel that these standards are outdated and need revision. It is our hope that the width of the Riparian Buffer zones in the Nash Stream Watershed be increased to the maximum recommended buffer with a zero disturbance policy. We also ask that the harvesting be very closely monitored to assure these boundaries are maintained. We have seen evidence in other locations where violations are frequent and severe. This request is intended to maintain canopy cover, to reduce groundwater runoff and to maintain cool stream temperatures in all orders of streams. Low temperatures are vital to aquatic life and keeping silt runoff from waterways is critical to maintaining the health of aquatic species.
- 2) While we respect the interests of individuals in how they enjoy the forest, we have deep concerns about additional use of ATVs in Nash Stream Forest and the destruction of trails which they use. Their use creates noise, dust, mud and negatively impacts water quality where they travel due to a lack of trail maintenance. Our TU members prefer activities which have minimal impact on the natural surroundings and wildlife. The Kelsey Notch Trail is of particular concern due to its proximity to Nash Stream watershed headwaters. It appears to encroach on the riparian buffer zone and potential for damage to the watershed is high. The request for a south connector to allow access to Stark is also a concern due to increased traffic and lack of available NH Fish and Game Conservation Officers available to enforce regulations and prevent destruction to the watershed.

Please consider the wishes of our Ammonoosuc Trout Unlimited members before finalizing the 2017 Nash Stream Forest Management Plan.

Sincerely,



Arthur F. Greene, PhD
Board Member and Volunteer Coordinator
Ammonoosuc Chapter (#554) of Trout Unlimited

FEB 21 2017

D.R.E.D.



Director Brad Simpkins
 Attention Nash Stream Plan
 NH Division of Forests and Lands
 172 Pembroke Rd
 Concord, NH 03301

16 February 2017

Dear Director Simpkins,

I appreciate the opportunity to provide comments on the Draft Nash Stream Management Plan on behalf of the Audubon Society of New Hampshire. We were surprised and concerned to see that the Draft includes changes to the Management Vision and Principles. Having been involved in the Nash Stream Technical Team back at the time of State acquisition, it had been my understanding that the Vision and Principles were to remain sacrosanct, sort of like the U.S. Constitution, while the remainder of the Management Plan would be reviewed and revised periodically to best implement the Vision and Principles as conditions changed over time. The original wording of the Vision and Principles reflect an exhaustive (and exhausting!) public process that worked hard to develop consensus among many, diverse stakeholders. While it is easy to envision ways to "improve" on this language (with or without altering the original intent) more than 20 years after the fact, we believe that the original language was intended to guide management for the coming centuries, not just a few decades into the future. We urge you to restore the original Vision and Principles, and ensure that management adheres closely to those concepts.

Specific comments and suggestions follow.

3.2.4 Utility Corridors, 3.2.4.2. Power Line Easement- Portland Natural Gas (p.28)

This is actually a pipe line easement, rather than a power line easement. To follow the standard description for other easements, the width of the easement should be provided.

4.1.1 Topography and Bedrock Geology (p. 29)

It would be useful to include a map of the three major bedrock units.

4.2.1 Vegetation Patterns and Natural Communities

Lowland spruce-fir (p.32)

Eastern white pine (*Pinus strobus*) has a frequent, but scattered presence in many stands of lowland spruce-fir in Coos County. Given this species' value, both ecologically and economically, it seems worthy of mention here. If it is truly absent from the Nash Stream Forest, one suspects that would be the case as a result of past timber practices rather than natural conditions. I haven't been on Nash Stream Forest for a while, but I seem to remember some pine over east of the Percy Peaks. I think that may have been in more of a mixed forest.

STATEWIDE OFFICES

84 Silk Farm Road
 Concord, NH 03301
 Phone 603-224-9909
 Fax 603-226-0902
 nha@nhaudubon.org
 www.nhaudubon.org

REGIONAL CENTERS

**AMOSKEAG FISHWAYS
& LEARNING CENTER**

Fletcher Street
 P.O. Box 330
 Manchester, NH 03105
 Phone 603-626-3474
 Fax 603-644-4386

*Managed by NHA in partnership
 with Eversource, the NH Fish &
 Game Department, and the US
 Fish & Wildlife Service.*

MASSABESIC CENTER

26 Audubon Way
 Auburn, NH 03032
 Phone 603-668-2045

MCLANE CENTER

84 Silk Farm Road
 Concord, NH 03301
 Phone 603-224-9909

NEWFOUND CENTER

50 North Shore Road
 PO Box 142
 Hebron, NH 03241
 Phone 603-744-3516

4.2.2 Rare Plant Species

Seems like it would be worth including a list of additions to the state rare plant list that could potentially occur on the Forest given latitude, elevations, and available habitats.

4.2.3. Natural Areas

Will the final plan include a map of the five natural areas/preserves?

4.2.4 Invasive Plant Species

Common reed (p. 37) Unlike glossy false buckthorn and Japanese knotweed, there is no discussion of whether or not this occurs on NSF. If not, it would be worth mentioning the distance from the nearest colony to Nash Stream Bog. A major infestation would present a significant threat to the ecological health of the Bog.

It seems like purple loosestrife (*Lythrum salicaria*) is another species that could potentially impact the Bog. Perhaps worthy of mention?

Objective 3. (p.38)

I strongly recommend including some mention of a management plan as part of this objective. This may be as simple as referencing a manual for invasive species control on other state lands, but the NSF plan needs to include some kind of guidance for control measures, should they become necessary, not just inventory and monitoring.

Table 4. Amphibian and Reptile Species Known or Expected to Occur in NSF. (p. 51)
Eastern ribbon snake (*Thamnophis sauritus*) should be included as expected. I have photographed one in Dixville.

Table 5. Birds Documented in NSF During Breeding Season (pp. 51-53)
Table 11 mentions Northern Goshawk activity in the lower Nash Stream valley and the vicinity of Nash Bog, but it not included in Table 8. The wood thrush is included in Table 8 but not in Table 5.

Table 6. Bird Species Not Yet Documented Which May Occur in the NSF During the Breeding Season

Table 7. Bird Species Which May Occur in the NSF as Migrants, Transients, or Winter Visitors
I suggest moving Merlin and Osprey from Table 7 to Table 6, adding Wild Turkey, Eastern Kingbird, Song Sparrow, and White-winged Crossbill to Table 6, and adding Bald Eagle and Solitary Sandpiper to Table 7.

Table 9. Mammals known and likely to occur on NSF (p.56)
Short-tailed shrew (*Blarina brevicauda*), Deer mouse (*Peromyscus maniculatus*), and Red-backed mouse (*Clethrionomys gapperi*) should be added to the list of other mammals likely to occur.

Species of Management Concern (p. 57)

Criteria for primary targets should include species of greatest conservation need in Wildlife Action Plan in first bullet.

Table 11. Target species of management concern with preferred habitat and management recommendations.

Habitat management guidelines (attached) have recently become available for Canada Warbler and Rusty Blackbird. In Preferred Habitat block for Rusty Blackbird, edit to "... with **young or stunted** spruce-fir forest..." In the Habitat Availability in NSF block, I would be inclined to replace the current text with "vicinity of beaver flowages associate with Columbia Brook, East Branch, Nash Stream, and Bag Hill area."

Wildlife Goals, Strategies, and Implementation

Objective 1. Assess and continue to monitor high priority (i.e., primary target) vertebrate and selected invertebrate populations, and identify opportunities to carry out high priority wildlife research in the NSF.

Implementation: Include Rusty Blackbird in examples provided in last bullet.

Objective 2: Work towards the flowing desired future condition for forest and non-forest structure and composition to provide suitable habitat for the entire suite of primary and secondary target species. In second paragraph, it would be appropriate to add after the Ruffed Grouse et al. sentence: "Rusty Blackbirds nest in dense, regenerating spruce-fir forest."

Objective 3. Land managers will consider and incorporate management recommendations for primary and secondary target species of management concern for timber sales, noncommercial habitat projects, and public recreation projects.

Strategies. 1. Add "and available regional habitat guidelines for primary target species."

Objective 4: Develop new standards for forest resource inventory that will allow analysis of within-stand features important to primary and secondary target species.

Eliminate rusty blackbird from list of species to which understory and midstory cover are important.

FISHERIES – I have refrained from dealing with typos throughout, but assume someone has already picked up on this one!

7.2.2.2. Sawtimber

A more comprehensive species-specific discussion would be useful here.

Goal: Manage Nash Stream Forest and its timber resources to achieve continuous yield of wood products from an ecologically sustainable forest.

Objective 3: Implement procedures to achieve and maintain a healthy and ecologically sustainable forest and timber resource.

I would like to see a strategy such as "Explore opportunities to increase white pine distribution and abundance on the NSF."

Thank you for the opportunity to comment on the draft plan. Again, I urge you to restore the original Vision and Principles language. I look forward to the finished product!

Sincerely,



Carol R. Foss

Senior Advisor for Science and Policy



Guidelines for Managing Canada Warbler Habitat in the Northeast and Mid-Atlantic Regions

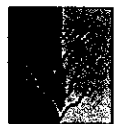


Guidelines for Managing Canada Warbler Habitat in the Northeast and Mid-Atlantic Regions

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Project development by J. Daniel Lambert (High Branch Conservation Services) and Leonard Reitsma (Plymouth State University). Text by Charlotte Harding, Leonard Reitsma, and J. Daniel Lambert. Maps by Andrew Toepfer Natural Resource Mapping and Cartographic Services and J. Daniel Lambert.



High Branch
Conservation Services

Plymouth State
UNIVERSITY

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Introduction

Species profile

The Canada warbler is a small, active songbird with a slate-colored back, bright yellow underparts, and a distinct whitish eye-ring. A necklace of bold, black streaks adorns males of the species, but is less distinct on females and young birds. This long-distance migrant nests in deciduous, coniferous, and mixed woodlands from eastern British Columbia across southern Canada and the US Great Lakes region to Nova Scotia. Its breeding range extends south through New England and along the Appalachian highlands to northern Georgia (Figs. 1 and 2). Canada warblers overwinter in northwestern South America, primarily in and east of the Andean foothills.¹

In the northeastern United States, Canada warblers are most abundant in moist deciduous and mixed forests that feature openings in the canopy,^{2,3} a leafy understory,^{4,5} exposed song perches,⁵ and uneven ground littered with woody debris.^{6,7} Swamps, bogs, riparian thickets, regenerating timber cuts, and natural canopy gaps provide suitable habitat for this insectivore.⁸⁻¹¹ Canada warblers sometimes inhabit pockets of disturbed spruce-fir forest in the northern mountains,¹² but they are more common in forested, headwater wetlands and rhododendron thickets of central and southern Appalachia.^{13,14} Nests are usually built on the ground, where they are concealed among root masses, stumps, fallen logs, ferns, and mossy hummocks.^{7,15} Breeding territories often occur in clusters, which are referred to as neighborhoods.¹⁶

Status and conservation concerns

The Canada warbler is listed as threatened in Canada under the Species at Risk Act and as a Species of Greatest Conservation Need in nearly every state where it breeds in the US. Although population increases are underway from northeastern Pennsylvania to northern Georgia, negative trends predominate across most of its range. Since 1966, population declines have been especially pronounced in the Atlantic Northern Forest, along the New England-Mid-Atlantic Coast, and across the central Allegheny Plateau (Fig. 2).¹⁷ Contributing factors likely include forest loss and fragmentation on both the breeding and wintering grounds resulting from urban, residential, and agricultural development.¹ Many of the remaining breeding areas

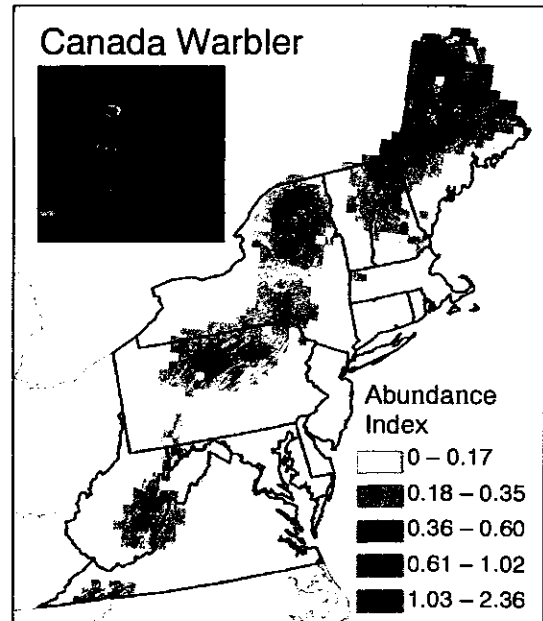


Figure 1. Canada warbler relative abundance in northeastern forests based on a five-year mean of Breeding Bird Survey route counts (2008 to 2012; Sauer et al. 2014).

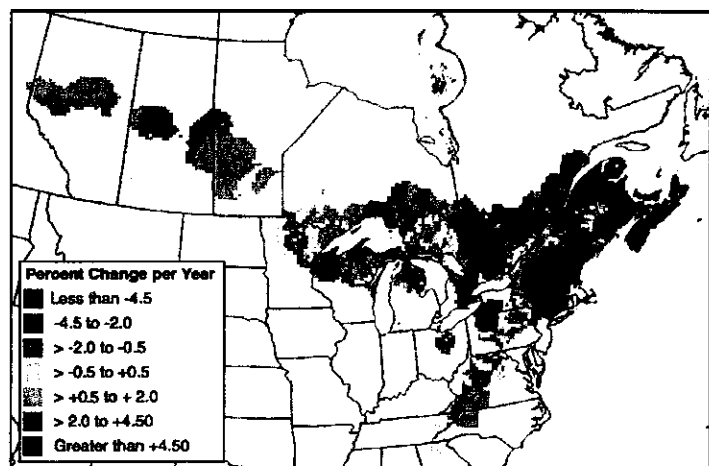


Figure 2. Canada warbler population trends, 1966-2012 (Sauer et al. 2014).

currently lack vertical layering and patchiness due to heavy deer browsing, the spread of invasive plants, and/or management approaches that reduce structural complexity. Another source of concern is the Canada warbler's relatively high risk of mortality from collisions with buildings during migration.¹⁸

Purpose of the guidelines

The purpose of these guidelines is to promote the conditions and processes that benefit Canada warblers, as well as other native species that depend on similar habitats in the US Northeast and Mid-Atlantic regions. Public and private land managers, forestry professionals, and conservation planners may find them useful in accomplishing their stewardship objectives. Effective approaches to conserving Canada warblers and associated species will vary throughout the region, depending on prevailing land uses, stressors, and wildlife management priorities. In recognition of this heterogeneity, these guidelines offer forest management and conservation strategies that should be selectively applied based on local knowledge and stewardship objectives.

In general, harvest-based strategies are likely to be most useful in areas of active forest management, particularly large ownerships that include forested wetlands. Forest preservation may also be effective at sustaining Canada warbler populations on large tracts that contain the requisite soils, stem densities, and ground complexity. Combined approaches can be applied to areas where harvesting is limited but conservation objectives call for some level of habitat manipulation.

Where to Create and Sustain Habitat

Landscape characteristics

Efforts to conserve Canada warbler habitat should focus on forested landforms that are likely to maintain suitable conditions over time, especially poorly drained areas where saturated soils and standing water favor the growth of shrubs over large trees. Wetland and riparian forest canopies are frequently disturbed by beaver activity and mortality of shallow-rooted trees. These create canopy gaps and promote growth of protective cover and leafy, foraging structure. In addition, swamps and streamside forests supply abundant flying insects to breeding adults and their offspring.

Ridges, steep hillsides, and ravines are also important to Canada warblers, especially in the Allegheny and Blue Ridge Mountains. These features often maintain canopy openings that expose the understory to sunlight. In areas with high topographic relief, Canada warblers appear to prefer east-facing slopes that are lit early in the day (promoting soil warming and understory growth) and are shaded later in the day (conserving moisture) (Fig. 3).¹⁹



Figure 3. Early light in a Blue Ridge oak-heath forest, where Canada warbler numbers are increasing in rhododendron thickets.

Landscapes managed for forest products, among other values, offer high potential for improving and sustaining Canada warbler habitat. This is because well-planned harvest regimes ensure a spatially dynamic, but continuous supply of young forest. A viable forest products industry also safeguards against

the agricultural, residential, and urban development that has degraded habitat in more densely populated regions.

Silvicultural approaches to habitat management can be most effective on commercial, state, and national forests, because of the opportunity to provide desired conditions across major management units (Fig. 4). Large individual holdings, as well as county and town forests, also offer good opportunities for managing Canada warblers and associated species. Small woodlots and forest reserves can play a complementary role if they uphold high regional forest cover and wetland integrity.

Although their minimum area requirements are not known, Canada warblers appear to be sensitive to forest fragmentation. Levels of abundance and occupancy are positively correlated with forest area and continuity.^{9,10,20}

Canada warblers preferentially select landscapes with > 50% forest cover²¹ and woodland tracts of 1,000 acres or more.⁹ Canada warblers may be more likely to inhabit small swamps surrounded by forest than large swamps isolated by development. Also, swamps with heterogeneous edges and long and irregular perimeters seem to offer higher value than those with simple boundaries.¹⁰

Desired Habitat Conditions

Forest composition

Composition of Canada warbler habitat varies by elevation and latitude. In the central Appalachian portion of its range, the bird is found primarily above 2,800 ft in northern hardwoods and conifer forests (eastern hemlock, red spruce, black spruce, and tamarack), especially in association with headwater shrub swamps and woody peatlands.^{7,14} Canada warblers also occur in cove hardwoods below 2,800 ft and high-elevation oak-heath forests of southern Appalachia.^{1,7} In the North, they inhabit red maple, black spruce, and cedar-fir swamps as well as oak-hickory, northern hardwood, spruce-fir (Fig. 5), and mixed upland forests.^{1,4,10} Canada warblers observed in a predominantly deciduous Wisconsin forest preferentially foraged in aspens and conifers, including white pine, black spruce, and balsam fir.²² Studies in Maine have found Canada warblers to be more common in mixed forests than in pure stands.^{2,23}

The shrub and small tree species that predominate in Canada warbler territories include, from south to north, rhododendron, mountain laurel, Labrador tea, bog rosemary, leatherleaf, and various species of alder, holly, and viburnum.^{1,5,13,14} However, breeding sites are selected based on the structure of the understory, not its composition.^{23,24}



Figure 4. A commercially managed forest in New Hampshire provides shifting patches of breeding habitat for Canada Warblers.

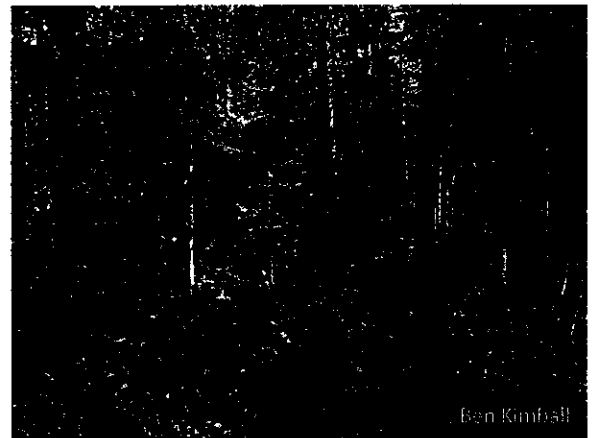


Figure 5. Shrubs, saplings, and small trees (6-20 ft high) provide ideal cover for Canada warbler nesting and foraging.

Forest structure

Throughout the eastern US, Canada warblers select moist and structurally complex forests featuring an open or broken canopy with exposed song perches elevated above a leafy understory and uneven forest floor. Specific elements contributing to this complexity differ somewhat among regions, landforms, and forest types. Still, the following features generally characterize high-quality habitat from Virginia to Maine.

- Canopy height (overstory): < 50 ft ^{5,6,23}
- Canopy cover (overstory): 5-85% ^{3,6,8}
- Basal area of overstory trees: < 70 ft²/ac ³
- Subcanopy height: 6-20 ft ^{8,23,25}
- Subcanopy cover: > 60% ⁷
- High volume of subcanopy foliage ⁵
- Moderate to high density of woody shrubs and saplings ^{5,7,8,23}
- ≥ 5 song perch trees per acre, emerging ≥ 10 ft above the subcanopy; dispersed individually, aggregated in groups, or located at the edge of a forest opening
- ≥ 15 ft of open canopy around/adjacent to each of these song perch trees (Fig. 6) ⁵
- Uneven forest floor with down woody material (logs, branches, stumps, and root masses) comprising > 10% of the ground cover ^{6,7,15}
- Moderate to high herbaceous plant, fern and moss cover (but not strictly ferns) ^{6,21}



Figure 6. Males choose prominent perches for singing and visual display.

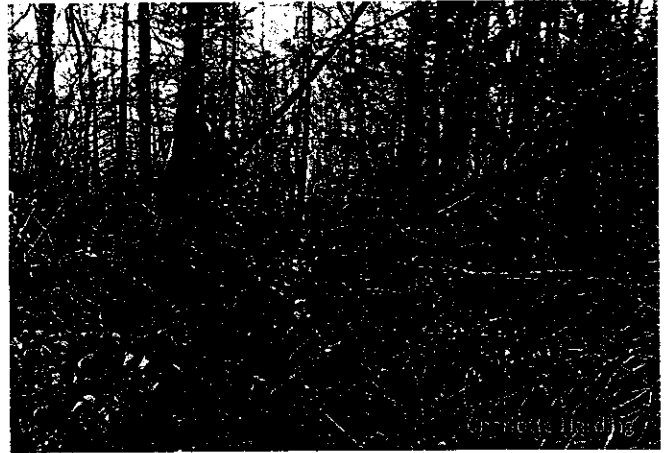
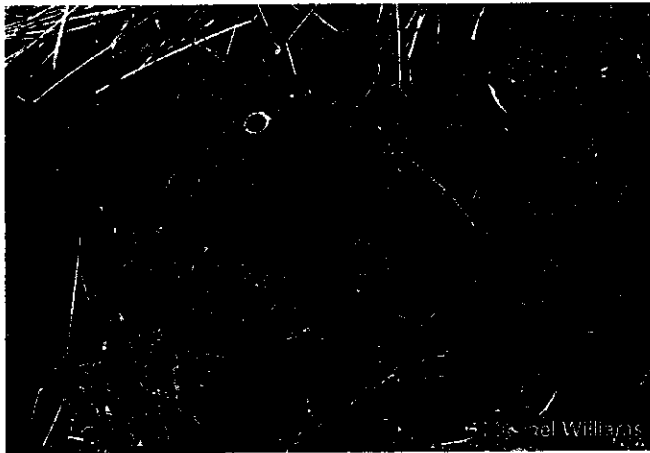


Figure 7. Females tuck nests into the sides of mossy hummocks, root balls, or other ground-level structures.

To function as Canada warbler habitat, suitable structure should predominate over at least half an acre, the average size of a territory core. Because full territories average between 2.5 and 3 acres and are frequently clustered in neighborhoods,¹⁶ large patches with >10 acres of suitable habitat offer more value than small patches. Forested connections among habitat patches also enhance their value.

Forest age

- Canada warblers breed in uneven-aged forests, including old forests, and in young, even-aged stands (saplings to poles).⁴
- In managed forests, they are most abundant in partially or heavily harvested areas after regenerating saplings become well established among residual trees.^{2,7,8}
- Suitable structure typically appears 5 years after timber removal or natural gap formation and persists for 15-20 years.^{2,26,27} Timing is influenced by site conditions, the amount of pre-existing and retained understory, and browsing pressure.
- The positive response of Canada warblers to harvesting may be muted in clearcuts > 3 acres, where no trees are retained. Here, males resort to perimeter trees for song perches and visual display.⁷ Still, regenerating clearcuts with no residuals support higher densities than mature stands.^{2,7,28,29}
- Forested wetlands and naturally disturbed areas within old forests often provide sustained habitat without the ephemerality that can disrupt longer-term occupancy of harvested areas.

Recommended Practices

Methods to maintain and create Canada warbler habitat will depend on regional context, site conditions, and other management considerations. For certain areas, prioritizing conservation of forested tracts with mosaics that include suitable habitat may be the best approach to sustaining Canada warblers and associated species. Elsewhere, active management may be more effective at promoting the desired conditions. Forest managers who encounter difficulty in selecting among land conservation and forest management practices are encouraged to consult their state wildlife agency for guidance.

Land conservation

The following strategies are recommended for conservation planners and land trust personnel working in regions with low to moderate levels of human development. Some may also be appropriate for designating reserves or special treatment areas in managed forest landscapes, particularly where natural Canada warbler habitat overlaps ecologically sensitive features.

- Focus conservation resources on large forested areas (>1,000 acres) where Canada warblers are known to breed or stop over, especially where moist forest, dense understory, and relatively open canopy are naturally maintained (e.g., headwater swamps, boreal peatlands, ravines, and steep, east-facing slopes). Minimize forest loss and fragmentation within such areas and consider reforestation of adjacent lands as opportunities allow.
- Conserve forest blocks with low edge-to-interior ratios to maximize forest cores and minimize edge effects such as nest predation and penetration of invasive plants.
- Connect suitable habitat patches with forested corridors to allow future breeders to discover potential breeding sites during post-breeding dispersal. Shrubby utility rights-of-way may also serve this connecting function.
- Develop easements and stewardship plans that allow for forest management where it has potential to improve Canada warbler habitat.

Forest management planning

The following strategies are intended for landowners, land managers, and forestry professionals.

- To provide a steady supply of suitable habitat, continuously maintain 12-20% of managed forestland in the desired condition.
- Build on natural population centers (e.g., red maple, northern white cedar, and spruce-fir swamps) by harvesting a nearby mature stand at least every 15 years.
- Implement silvicultural systems that are most likely to produce the desired conditions: shelterwood cuts or expanding-gap group shelterwoods, seed-tree cuts, and clearcutting with reserves. Because occupancy and abundance levels are positively correlated with treatment area, benefits to Canada warbler increase with harvest size.
- Where other management objectives align more closely with natural dynamics forestry, harvest trees in 0.5- to 2-acre groups, with mid-story trees left scattered in the openings. Cluster the harvests to increase the probability of occupancy.
- Maintain a mix of hardwoods and softwoods at the stand and landscape levels through use of natural regeneration forestry and limits on use of hardwood herbicides on softwood sites.
- Implement variable retention thinning and/or crop-tree release after the stand height exceeds 15-20 ft to open the canopy and enhance understory structure (Fig. 8).

Forestry operations

- In harvest areas > 2 acres, retain at least 5 standing trees per acre, dispersed individually or in several clumps. These may range from large saplings to trees under 50 ft in height. Provide at least 15 ft of separation among these singing/visual display centers. Choose stems that reach at least 10 ft above the subcanopy (if present).
- In larger harvests, maintain these conditions in 2- to 3-acre portions of the cut (better if each portion is greater than 10 acres).
- If practical, avoid felling and skidding operations in likely Canada warbler habitats during periods of nesting and fledgling activity (mid-May to mid-August), especially in previously entered shelterwood stands. Seasonal limits are not as critical in mature stands, where use by Canada warblers is lower.
- Minimize compaction of down woody material, stumps, hummocks, and root masses of ferns and trees. These essential habitat features conceal nests and offer protective cover to parents tending eggs and young. Possible measures include harvesting on snowpack and restricting heavy machines to temporary routes and landings.

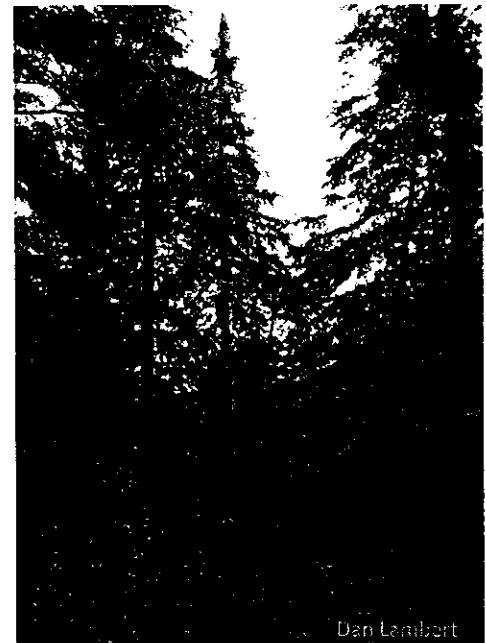


Figure 8. Gaps created by natural disturbance or variable retention thinning enhance conditions for Canada warbler by increasing layering and patchiness.

- Protect patches of advanced regeneration and woody material by minimizing travel and maximizing trail-spacing and machine reach. Patches measuring 0.25-0.5 acres may serve as future territory cores.
- If practical, top and delimb trees near the stump to enhance woody debris and forest floor structure (Fig. 9).

General Recommendations

- Restrict off-road use of all-terrain vehicles.
- Promote hunting to reduce browsing pressure by moose and deer.
- Limit beaver trapping in wetlands where beavers are not causing damage to road infrastructure or valuable timber.
- Follow best practices in invasive plant control in areas where invasive plants are common or a threat.



Figure 9. Manual and cut-to-length harvesting affords opportunities to enhance forest floor structure by topping and limbing at the stump. Harvests conducted by feller-buncher call for other approaches to retain debris on site.

Managing for Multiple Benefits

Current understanding of Canada warbler ecology is incomplete, particularly with respect to area requirements, site fidelity, population characteristics, and reproductive performance. However, detailed knowledge of this bird's habitat requirements provides a strong basis for stewardship actions that benefit Canada warbler and co-occurring species.

Associated species

Throughout the year, a wide variety of native wildlife makes use of the dense cover and abundant food resources that characterize regenerating forests and canopy gaps within mature forests (Table 1).³¹ The list includes young forest specialists (*e.g.*, golden-winged warbler and New England cottontails), mature forest associates that utilize sapling-dominated areas during a particular stage of the life cycle (*e.g.*, scarlet tanager and blue-headed vireo), and species primarily associated with multi-age forests (*e.g.*, cerulean warbler and moose). Swamps and riparian woodlands share many of the structural attributes of recently disturbed forests, since poor drainage inhibits canopy development. Maintaining these areas as Canada warbler habitat could benefit other species that inhabit forested wetlands, such as American woodcock and olive-sided flycatcher.

Table 1. A partial list of Species of Greatest Conservation Need that could benefit from implementation of these guidelines. Species of high regional concern are indicated in bold. Species co-occurrence varies across the region.

Species	Overlapping habitat(s)
Alder flycatcher	Moist riparian thickets and young forests
American redstart	Young deciduous forest
American woodcock	Young deciduous forest, shrubby streamsid es
Black-billed cuckoo	Mixed woodlands and thickets near lakes, streams, wetlands and bogs
Blue-headed vireo	Mixed mature forest during nesting; mature and young forest after nesting
Blue-winged warbler	Young deciduous forest
Cerulean warbler	Mature deciduous forest with canopy gaps and well-developed understory
Chestnut-sided warbler	Young deciduous forest
Eastern towhee	Areas with few large trees, an open canopy, and dense shrub layer
Golden-winged warbler	Young forests and swamps with dense understory, open canopy, and emergent song perches
Indigo bunting	Young forest, sometimes near wetlands, swamps, rivers
Magnolia warbler	Dense, young conifer forest
Nashville warbler	Young mixed forests near bogs and forest openings with dense undergrowth
Northern waterthrush	Shrubby wetlands and riparian forests with abundant logs and stumps
Olive-sided flycatcher	Wetlands and young forest with tall snags
Ruffed grouse	Regenerating deciduous forest with high density of woody debris such as fallen logs
Scarlet tanager	Mature deciduous forest during breeding; young and mature forest after breeding
Spruce grouse	Spruce-fir forests and bogs with a thick layer of low vegetation
Rusty blackbird	Young spruce-fir forest near low-gradient streams and bogs
Veery	Young deciduous or mixed stands with dense understory adjacent to streams
Willow flycatcher	Dense, shrubby thickets near standing or running water
Yellow-bellied flycatcher	Damp northern forests (mixed and conifer) with mossy ground and down woody material
Yellow-breasted chat	Dense shrubby tangles and moist, streamside areas
Appalachian cottontail	Montane forest and forest-shrub wetlands with dense understory
Bobcat	Young deciduous, coniferous, or mixed forest
Lynx	Young spruce-fir forest
Moose	Young forest and forested wetlands
New England cottontail	Young forest thickets
Snowshoe hare	Moist, dense, young spruce-fir forest
Spotted turtle	Bogs, shrub swamps, and forested wetlands
Wood turtle	Streamside thickets with open canopies
Mtn. dusky salamander	Moist forest near headwater streams and seeps
Wehrle's salamander	Mixed and conifer forests at upper elevations

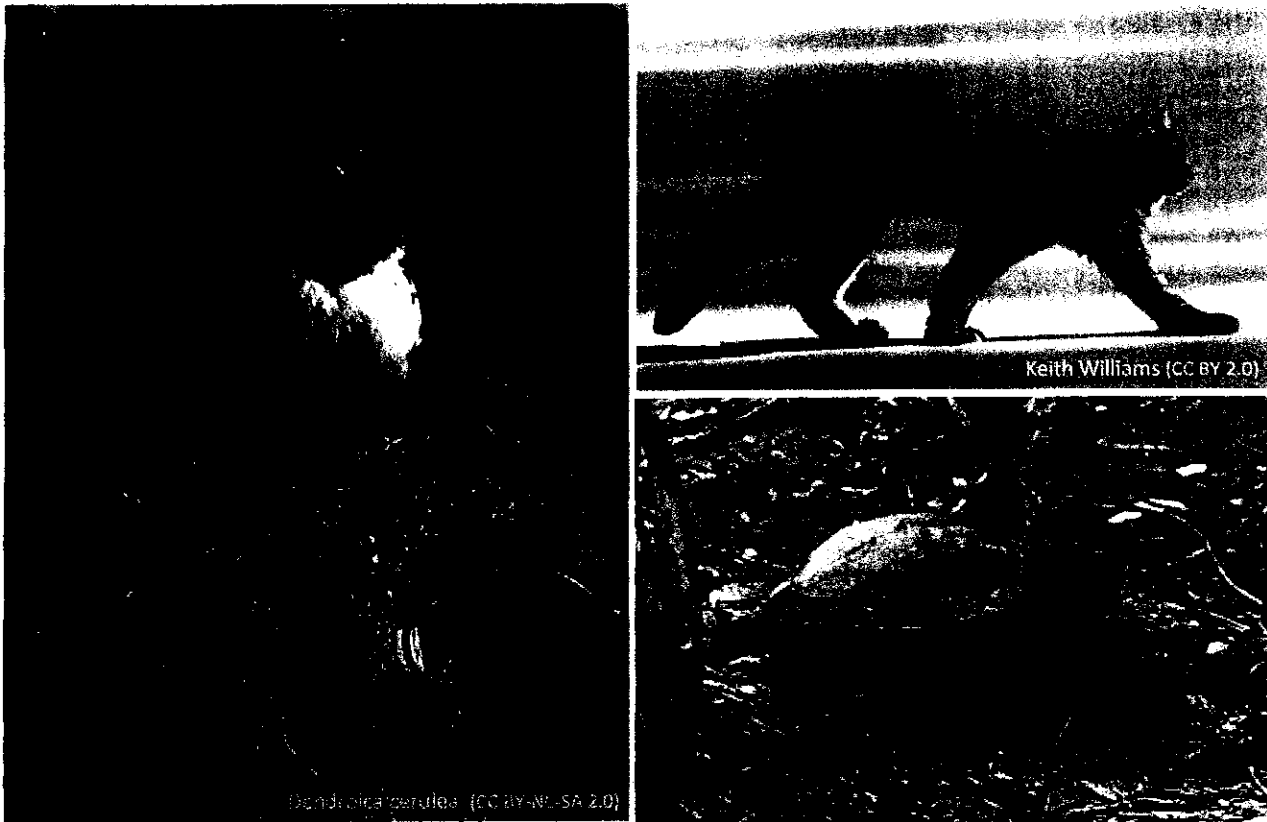


Figure 10. Managing forests for Canada warblers may also benefit numerous Species of Greatest Conservation Need, including Eastern towhees, Canada lynx, and wood turtles.

Ecosystem services

In addition to wildlife conservation, a number of other ecological and societal benefits arise from sustainable management of Canada warbler habitat. These include: water quality protection, flood regulation, enhanced pollinator populations within shrubby openings, and support for local economies that rely on the forest products industry and nature-based recreation. Furthermore, Canada warblers and other birds help maintain tree vigor and growth by controlling invertebrate pests, including up to 84% of spruce budworms.^{31,32}

Comprehensive planning

When implementing these guidelines, forest stewards should weigh the possible impacts on other species of concern that are not associated with Canada warbler habitat. For example, conversion of older forests to young stands may adversely affect mature forest birds, such as northern goshawk and Blackburnian warbler, unless measures are taken to sustain mature forests in the surrounding landscape. Regional conservation partnerships and managers of large properties can deliver a broad range of benefits concurrently by shifting through a mosaic of cover types and age classes over time. Adaptive management that considers regional context, monitors the status of wildlife, and regularly incorporates new information can help forest managers balance multiple conservation objectives. Ultimately, local knowledge of conservation issues and forest dynamics is key to making sound decisions related to location, extent, and intensity of management activity.

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Acknowledgments

These guidelines were developed in concert with the Canada Warbler International Conservation Initiative and the Northeast Fish and Wildlife Diversity Technical Committee, with support from State Wildlife Grant funding awarded through the Northeast Regional Conservation Needs (RCN) Program. The RCN Program joins thirteen northeastern states, the District of Columbia, and the US Fish and Wildlife Service in a partnership to address landscape-scale, regional wildlife conservation issues. Progress on these regional issues is achieved through combining resources, leveraging funds, and prioritizing conservation actions identified in the State Wildlife Action Plans. See RCNGrants.org for more information. We thank Dave Jenkins (New Jersey Department of Environmental Protection), who provided guidance and oversight on behalf of the multi-state cooperative. He and more than seventy-five other conservation, wildlife, and forestry professionals from thirteen states and provinces provided helpful input on planning the format and contents of this publication. We gratefully acknowledge Barry Burgason (Huber Resources Corp), Kevin Evans (Dartmouth College Woodlands), John Gilbert (Irving Woodlands), Dan Hudnut and Scott Rineer (Wagner Forest Management), Will Staats and Jillian Kilborn (New Hampshire Fish and Game Department), and Henning Stabins, Ray Ary, and Rocky Rockwell (Plum Creek Timber Company), who advised on forest and wildlife management practices. We also thank Dan Harrison and Brian Rolek (University of Maine) for sharing findings from their research on avian responses to forestry practices and the following individuals for participating in the technical review of this document: Haley Andreozzi (University of New Hampshire), Barry Burgason, Rachel Cliche (US Fish and Wildlife Service), Doug Gross (Pennsylvania Game Commission), Dan Hudnut, Pam Hunt (Audubon Society of New Hampshire), Dan Kilborn (Vermont Land Trust), Jillian Kilborn, Jon Klischies (New Jersey Forestry Service), Amanda Rodewald (Cornell Lab of Ornithology), Bill Stack (Seventh Generation Forestry), Cecile Stelter (Pennsylvania Bureau of Forestry), Matt Tarr (UNH Cooperative Extension), Suzanne Treyger (Audubon New York), Rachel Vallender (Canadian Wildlife Service), Steve Weber, Alana Westwood (Dalhousie University), and Jeff Wiegert (New York State Division of Lands and Forests).



Field Guide to Managing Canada Warbler Habitat

Companion to *Guidelines for Managing Canada Warbler Habitat in the Northeast and Mid-Atlantic Regions*

Status: Species of Greatest Conservation Need in all eastern states from NC to ME

Habitats: Moist deciduous, coniferous, and mixed forests with thick understory and open or broken canopy, including swamps, shrub thickets, riparian woodlands, bushy ravines, young forests, and tree-fall gaps. Special requirements include: complex forest floor, leafy subcanopy with trees 6-20 ft high, and open song perches.

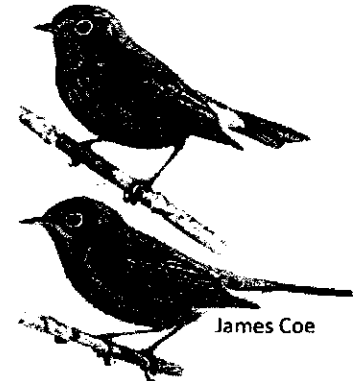
Territory size: Typically 2.5-3 acres, ranging between 0.5 and 8 acres

Diet: Primarily mosquitoes, flies, moths, and caterpillars captured by flycatching, gleaning, and hover gleaning

Nest: On or near the ground, hidden in mossy hummocks or beneath root masses, down wood, and clumps of grass

Associated species: Varies geographically and includes alder flycatcher, American redstart, American woodcock, black-and-white warbler, chestnut-sided warbler, Louisiana waterthrush, magnolia warbler, Nashville warbler, northern waterthrush, olive-sided flycatcher, veery, yellow-bellied flycatcher, bobcat, moose, wood turtle

Recommended Forest Management Practices: When conducted in the appropriate context, some methods of timber harvesting can enhance habitat quality for Canada warblers and associated species. However, conservation benefits may be low in areas where suitable habitat occurs naturally, especially if invasive plants present a significant threat. For more discussion of where to create and sustain habitat, consult the complete guidelines. The following table summarizes options for creating the desired stand-level conditions.



from *Eastern Birds*, St. Martin's Press, 1981
jamescoe.com

Starting Condition	Objective	Management Options	Desired Condition
High canopy cover and low shrub/sapling density	Open canopy and increase light to the understory	Clearcut with reserves Seed-tree harvest Shelterwood Clearcut Patch cut with reserves Expanding-gap group shelterwood Group selection	Canopy height: < 50 ft Canopy cover: 5-85% Canopy tree basal area: < 70 ft ² /ac Subcanopy height: 6-20 ft Subcanopy cover: > 60% Moderate to high density of woody shrubs and saplings Low density of pole-sized and larger stems (> 5 in dbh) ≥ 5 song perch trees per acre, emerging ≥ 10 ft above the subcanopy, including trees along edge of forest openings
Open or even forest floor	Enhance forest floor structure	Leave/recruit snags Top and delimb felled trees near the stump Leave slash and logs Girdling	Uneven forest floor with down wood covering > 10% of the ground Moderate to high herbaceous plant, fern and moss cover (not just ferns)

Additional Considerations

- Where desired conditions exist, protect saplings, shrubs, and forest floor structure by minimizing travel and maximizing trail spacing and machine reach. If practical, harvest on snowpack or frozen ground and avoid felling and skidding during periods of nesting and fledgling activity (mid-May to mid-August).
- In timber harvests > 2 acres, retain 5 or more song perch trees per acre, scattered such that individuals and clumps are surrounded by > 15-ft openings. Choose stems that reach at least 10 ft above the regenerating layer. In larger cuts, consider creating blocks of 10 acres or more with these conditions.

Field Guide to Managing Canada Warbler Habitat

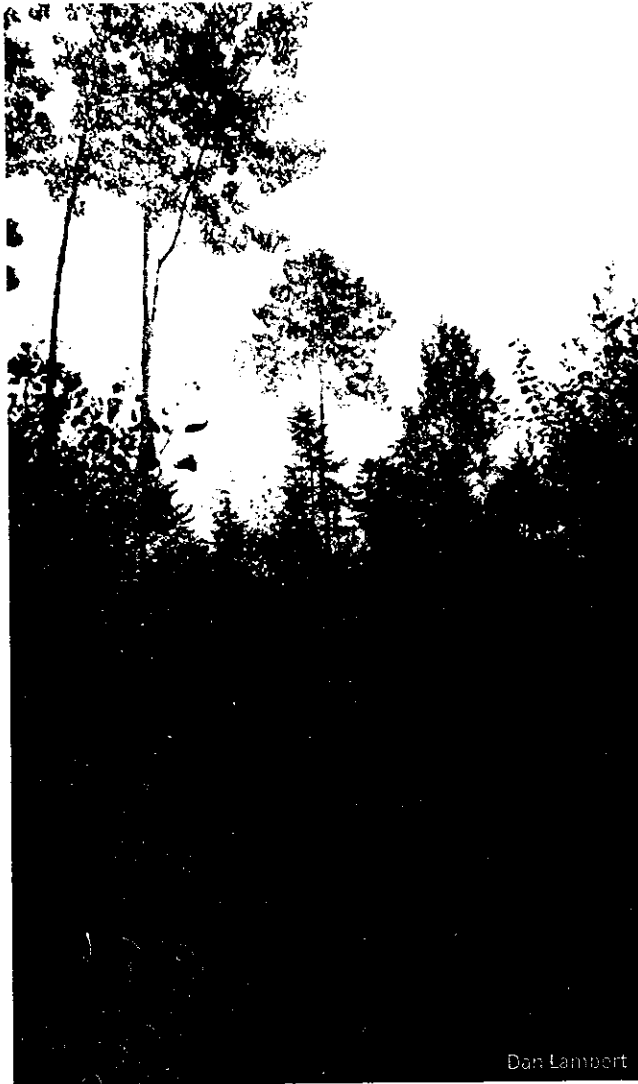


Dan Lambert



Eli Sagor (CC BY-NC 2.0)

Harvests that retain residual trees and woody material (left) provide two key habitat elements, prominent song perches and complex ground structure. Clearcuts and first-cut shelterwoods (above right) may develop suitable subcanopy structure within five years (below left). Regenerating patch and group cuts (below right) may also support breeding Canada warblers, especially if clustered or located near rivers or swamps (bottom right).



Dan Lambert



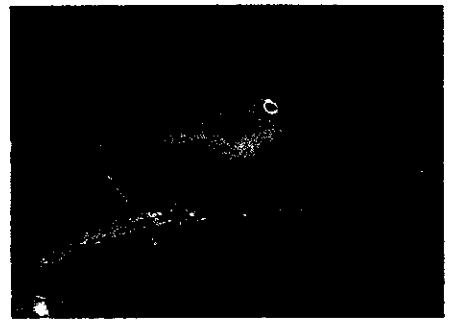
Bill Stack



Google Earth



Guidelines for Managing Rusty Blackbird Habitat
in New York and Northern New England



Guidelines for Managing Rusty Blackbird Habitat in New York and Northern New England

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Field Guide to Managing Rusty Blackbird Nesting Habitat	9

Text by Carol R. Foss (Audubon Society of New Hampshire) and J. Daniel Lambert (High Branch Conservation Services)



High Branch
Conservation Services

Cover photos of rusty blackbird and habitat by Rachel Rabinovitz, snowshoe hare by Tim Rains (CC BY 2.0), Swainson's thrush by Jeff Bryant (CC BY 2.0), and Nashville warbler by Bill Majoros (CC BY-SA 2.0). Maps by Andrew Toepfer Natural Resource Mapping and Cartographic Services.

Recommended Citation

Foss, C. R. and J. D. Lambert. 2017. Guidelines for managing rusty blackbird habitat in New York and northern New England. High Branch Conservation Services, Hartland, VT.

Introduction

Species profile

The rusty blackbird is an inconspicuous songbird, slightly larger than the more familiar red-winged blackbird, but noticeably smaller than the common grackle. Breeding males are glossy black, sometimes with a greenish sheen, and females are dull charcoal black. Both have bright yellow eyes. In late summer they molt into the rusty non-breeding plumage for which the species is named.

Rusty blackbirds spend their entire lives in North America (Fig. 1). The breeding range includes the boreal region from Alaska to Labrador and extends south through the Acadian forest into northern New England and New York. The wintering distribution lies primarily within the United States east of the Rocky Mountains.¹

In northeastern North America, rusty blackbirds breed in softwood-dominated stands in forested landscapes with an abundance of wetlands and low-gradient streams. Occupied landforms range from extensive lowland flats to mountainous terrain, at elevations from 980 to 2,600 ft. Typical nesting habitat consists of dense, young or stunted softwoods in or near a wetland.

Status and conservation concerns

Historical accounts suggest that Rusty Blackbird populations have been declining since at least the 1920s, and Breeding Bird Survey and Christmas Bird Count data indicate declines of more than 80% since the 1960s.^{2,3} Clearing of wintering habitat for agricultural uses may have been a primary cause of the long-term decline. Blackbird control efforts in southern states aimed at common grackles and red-winged blackbirds may also have affected wintering rusty blackbirds. Mercury contamination and acidification of breeding habitat may be contributing factors; however, their effects on rusty blackbirds are not well known. Available data suggest retractions to the north and higher elevations in the eastern part of the breeding range.⁴⁻⁸ Climatic influences are likely to be involved, but the mechanism underlying the shift has not yet been demonstrated.⁹

The rusty blackbird is listed as Endangered in Vermont, a Species of Special Concern in Maine and New Hampshire, and a high-priority Species of Greatest Conservation Need in Maine, New Hampshire, Vermont, and New York. The Committee on the Status of Endangered Wildlife in Canada designated the rusty blackbird a Special Concern species in 2006.

Purpose of the guidelines

These guidelines are designed to provide forest landowners and managers with an understanding of the habitat conditions and management actions that sustain rusty blackbird breeding populations in the Acadian Forest. They also describe how habitat conditions that benefit rusty blackbirds can benefit other native wildlife as well. Public and private land managers, forestry professionals, and conservation planners should find the information useful in accomplishing their stewardship objectives.



Figure 1. Rusty blackbird breeding and wintering ranges (based on Peterson 2008, Powell 2008, Fisher and Powell 2013, Audubon Society of NH unpubl. data, and BirdLife International and NatureServe 2015)

Where to Create and Sustain Habitat

Landscape characteristics

Rusty blackbirds inhabit large home ranges (10 to 430 acres) in extensive spruce-fir and mixed spruce-fir/northern hardwood forests with abundant wetlands and low gradient streams.¹⁰ Beaver-influenced wetland complexes are particularly favorable.^{11,12} Inhabited landforms range from extensive lowland flats to mountains interspersed with valleys.

In low-relief landscapes, rusty blackbirds often nest in forested wetlands that contain stunted conifers and surround shallow, open-water wetlands (Fig. 2). These areas typically appear as wetlands on stand maps or the National Wetlands Inventory. In high-relief landscapes with well-defined wetland/upland edges, rusty blackbirds may nest in regenerating softwood stands up to 800 ft from a mapped wetland where they travel to forage (Fig. 3). While these nest sites are not in mapped wetlands, they typically occur in seepage areas on partially hydric soils.

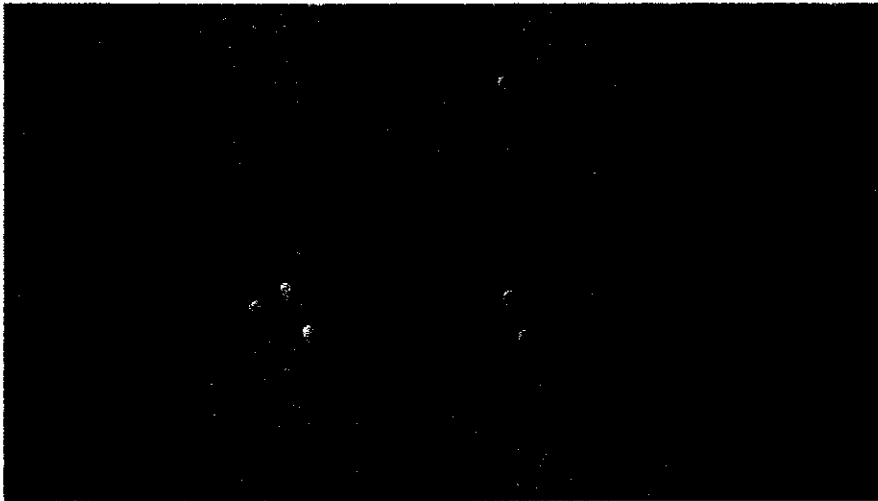


Figure 2. Rusty blackbird nest sites in a forested wetland surrounding shallow, open-water wetlands

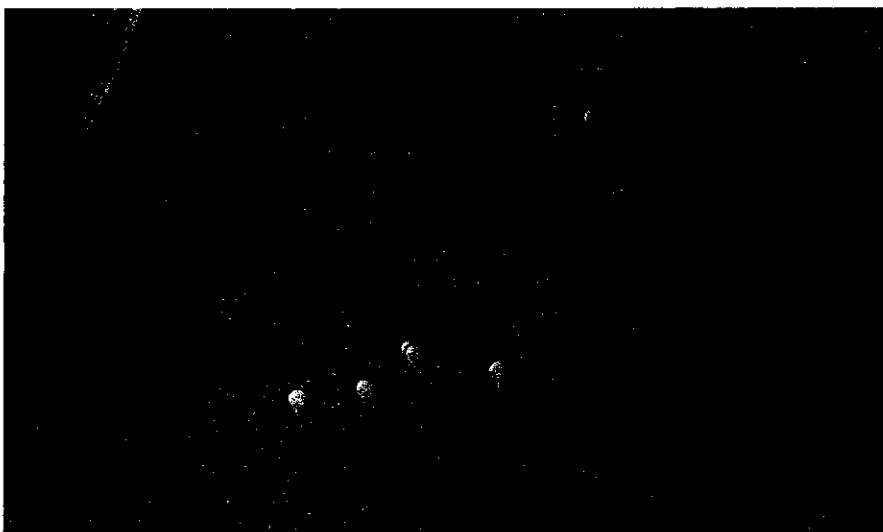


Figure 3. Rusty blackbird nest sites in regenerating softwoods on uplands surrounding a beaver impoundment

Within the rusty blackbird's northeastern US range, management opportunities exist primarily in areas of Boreal Upland Forest and Northern Swamp, as classified by the Northeastern Terrestrial Habitat Classification System (Figure 4).¹³ Areas appropriate for considering this species' habitat needs in planning forest management include the following characteristics:

- softwood and mixed stands
- within 800 ft of a shallow wetland or low gradient stream
- hydric or partially hydric soils
- at elevations of 980 to 2,600 ft
- with slopes less than 40% (or 22°)

Rusty blackbird planning units should maximize inclusion of spruce-fir and mixed forest and minimize inclusion of hardwood stands. Blocks of suitable nesting habitat may occur within a mosaic of softwood, hardwood, and mixed-wood stands and age classes.

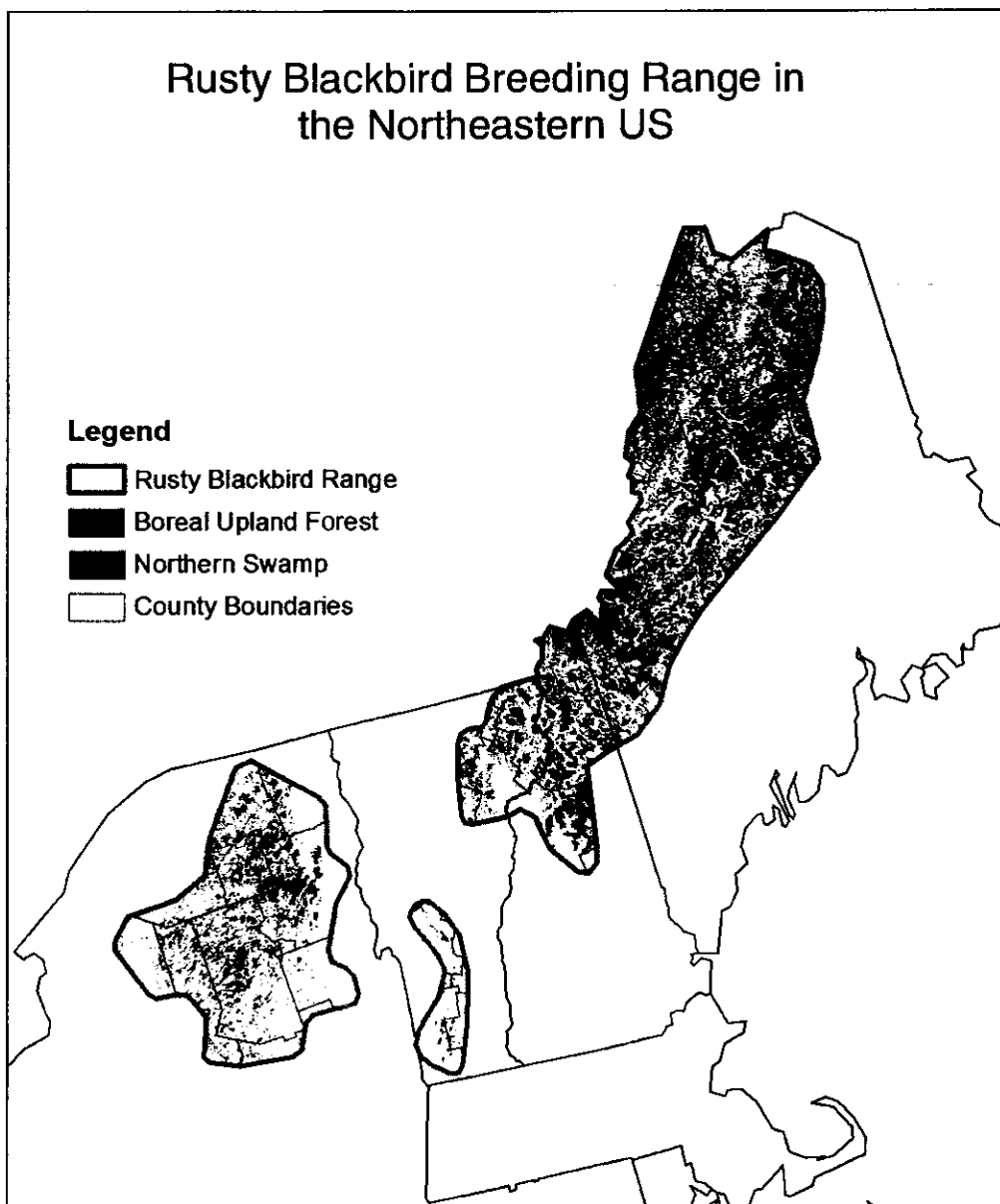


Figure 4. Rusty blackbird breeding range in the northeastern US with favored habitat classes

Desired Nesting Habitat Conditions ^{14,15}

Typical nesting habitat consists of dense, young or stunted softwoods (Fig. 5). In managed forests, rusty blackbirds usually nest in stands between approximately 5 and 15 years post-harvest. Tree growth rates vary depending on site conditions, and some patches may grow more or less rapidly than the majority of a stand. Such patches may extend the availability of suitable rusty blackbird nest sites at either end of the typical age range of suitability. The size of stands surrounding rusty blackbird nests varies widely from less than an acre to more than 100 acres. In commercial forests of Maine and New Hampshire, the stand size averages around 20 acres.



Figure 5. Dense softwood regeneration with seepage area in the foreground and emergent snags in the background

Scattered, live and dead residual overstory trees exceeding 13 ft in height are very important in rusty blackbird nest stands (Fig. 6). Species may include red and white spruce, balsam fir, tamarack, white pine, yellow and white birch, and red maple. Males watch for approaching predators from high perches near the nest site while the female is building the nest and laying and incubating eggs. When a male delivers food to an incubating female, she leaves the nest inconspicuously and joins him on a high perch to collect the food, returning by a circuitous route to avoid drawing attention to the nest location. Both adults check the vicinity from a series of high perches before delivering food to nestlings.



Figure 6. Multiple-aged regenerating softwoods with live and dead canopy trees available for high perches

Forest Composition and Structure

Forest type

- Spruce-fir

Age class structure

- Young, even-aged stands with scattered older trees

Overstory characteristics

- Canopy: open with trees dispersed individually and in clumps
- Composition: live or dead red spruce, white spruce, balsam fir, tamarack, white pine, white birch, yellow birch, and/or red maple
- Height: ≥ 13 ft

Regenerating stand characteristics

- $\geq 34\%$ softwood composition (primarily red spruce, white spruce and/or balsam fir; may also include white pine, tamarack) (Fig. 7)
- Height: 8-12 ft
- Diameter at breast height (dbh): 1.5-2 in
- Total horizontal cover (softwood and hardwood, all classes): $> 95\%$
- Total softwood cover: 35-100%
- Softwood seedling/sapling cover: 20-55%
- Total hardwood cover: up to 65%
- Patches of softwood saplings (dbh ≤ 4 in) with basal area ≥ 85 ft²/acre to provide cover for nesting (Fig. 8).

Recommended Practices

Methods to produce suitable forest composition and structure will vary by physiographic setting and each stand's starting condition. However, any practice that regenerates spruce and fir in the appropriate context has potential to benefit rusty blackbirds.

- The size and shape of a harvest area that creates nesting habitat will be dictated by topography and site conditions. Sizes may range from 2.5 to 100 acres; narrow, linear blocks should be avoided to the extent possible, especially adjacent to roads or mature softwood stands.
- Overstory removal with residual tree retention, in the presence of ample advance softwood regeneration, will consistently produce the desired conditions.
- Shelterwood harvests and clearcuts with retention can also be effective, but will take longer to reach the desired conditions.
- Retain mature dead and live trees, dispersed individually and in clumps, to maintain a scattering of overstory perch sites.
- Schedule harvests to provide a sapling softwood stand within 800 ft of a shallow wetland or low gradient stream throughout a rotation of the area.

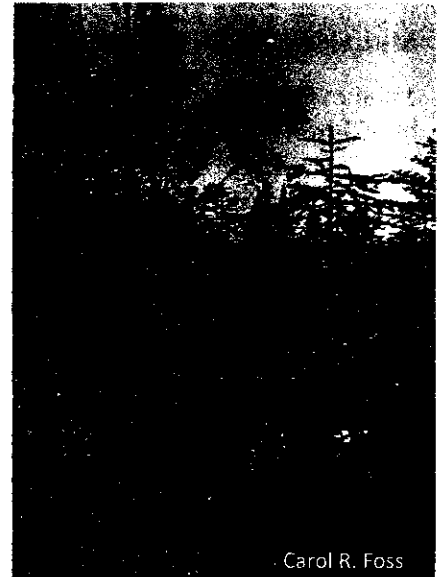


Figure 7. Mixed-species softwood regeneration



Figure 8. Most rusty blackbird nests (70-80%) are supported by branches of 2-4 saplings.

Managing for Multiple Benefits

Most even-aged silvicultural strategies used to manage spruce-fir forests in the Northeast benefit rusty blackbirds directly by creating the young forest conditions they prefer for nesting. Special management considerations for this species include: applying silvicultural practices that maintain or increase the softwood component of the stand; implementing a harvest schedule that maintains at least one softwood stand in a sapling stage within 800 ft of a wetland; and retaining scattered snags for perching. Many wildlife species benefit from access to a diversity of age classes within their home ranges. Standing dead trees provide nesting and denning/roosting cavities for birds and mammals and foraging perches for raptors and aerial insectivores.

Associated species

While a diversity of bird and mammal species use regenerating softwood and mixed-wood stands during some part of their annual cycle, a few benefit particularly from these habitat conditions. Evidence of heavy use by moose and snowshoe hare is abundant in rusty blackbird nest stands. Other bird species that frequently nest in these stands include alder and olive-sided flycatchers, magnolia and chestnut-sided warblers, dark-eyed junco, and Swainson's thrush. Management to benefit rusty blackbirds in mixed forests also complements best management practices for American woodcock promoted by the Young Forest Project, a partnership of state and federal wildlife agencies, the Wildlife Management Institute, and a number of forest landowners.

Table 1. A partial list of Species of Greatest Conservation Need that could benefit from implementation of these guidelines. Species of high or very high regional concern are indicated in bold.

Species	Overlapping habitat(s)
Alder flycatcher	Moist riparian thickets, shrublands and young forests with high density of trees
Blackpoll warbler	Young spruce-fir forest at high elevations and latitudes
Canada warbler	Young mixed spruce-fir/northern hardwood forest, swampy areas
Chestnut-sided warbler	Young mixed spruce-fir/northern hardwood forest
Dark-eyed junco	Young coniferous and mixed forests
Magnolia warbler	Dense young spruce-fir forest
Nashville warbler	Second-growth mixed forests, moist openings with dense undergrowth
Olive-sided flycatcher	Wetlands and young forest with tall snags
Purple finch	Coniferous forest edges
Spruce grouse	Dense lowland conifers (especially spruce, fir, and tamarack) with small
Swainson's thrush	Damp, young spruce-fir forests
Tennessee warbler	Moist areas of young mixed spruce-fir/hardwood forest
Pygmy shrew	Moist forest floors with accumulated debris in coniferous and mixed forests
Bobcat	Young spruce-fir forest
Lynx	Young spruce-fir forest
Moose	Lowland softwoods, young forest, and beaver ponds
Snowshoe hare	Moist, dense, young spruce-fir forest



Figure 9. Species that often utilize rusty blackbird habitat include (l-r) magnolia warbler, olive-sided flycatcher, and moose.

Comprehensive planning

Rusty blackbirds are highly mobile and readily colonize recently disturbed forests. Young stands favored by this species are not suitable for some spruce-fir specialists associated with more mature forests, such as northern parula and Cape May and bay-breasted warblers. However, maintaining a patchwork of age classes within management units enables wildlife species to move among suitable habitat patches as stands age into and out of favorable conditions. Local knowledge of stand conditions, landscape context and long-term landowner goals for size and age-class structure will be the most effective guides to the selection and timing of silvicultural treatments.

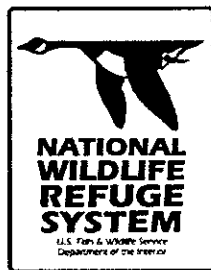
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Acknowledgments

These guidelines were developed in concert with the International Rusty Blackbird Working Group and the Northeast Fish and Wildlife Diversity Technical Committee, with support from the US Fish and Wildlife Service Northern Forest Land Management, Research, and Demonstration Program and State Wildlife Grant funding awarded through the Northeast Regional Conservation Needs (RCN) Program. The RCN Program joins thirteen northeastern states, the District of Columbia, and the U.S. Fish and Wildlife Service in a partnership to address landscape-scale, regional wildlife conservation issues. Progress on these regional issues is achieved through combining resources, leveraging funds, and prioritizing conservation actions identified in the State Wildlife Action Plans. See RCNGrants.org for more information. We thank Dave Jenkins (New Jersey Department of Environmental Protection), who provided guidance and oversight on behalf of the multi-state cooperative. He and more than fifty-five other conservation, wildlife, and forestry professionals from thirteen states and provinces provided helpful input on the format and contents of this publication. We gratefully acknowledge Barry Burgason (Huber Resources Corp), Kevin Evans (Dartmouth College Woodlands), John Gilbert (Irving Woodlands), Dan Hudnut and Scott Rineer (Wagner Forest Management), Will Staats (NH Fish and Game Department), and Henning Stabins, Ray Ary and Rocky Rockwell (Weyerhaeuser), who advised on forest and wildlife management practices. We also thank the following individuals for participating in the technical review of the document: Barry Burgason, Rachel Cliche (US Fish and Wildlife Service), Dan Hudnut, Pam Hunt (Audubon Society of New Hampshire), Jillian Kilborn (New Hampshire Fish and Game Department), Shannon Buckley Luepold, Luke Powell (Smithsonian Migratory Bird Center), Matt Tarr (University of New Hampshire Cooperative Extension), Steve Weber, and members of the Northeast Fish and Wildlife Diversity Technical Committee.

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Field Guide to Managing Rusty Blackbird Nesting Habitat

Companion to *Guidelines for Managing Rusty Blackbird Habitat in New York and Northern New England*

Status: Endangered in Vermont, Species of Special Concern in Maine and New Hampshire, and a Species of Greatest Conservation Need in Maine, New Hampshire, Vermont, and New York.

Foraging habitat: shallow wetlands, seeps, exposed mud, puddles, ditches, moist leaf litter

Nesting habitat: sapling softwood or mixed stands, stunted softwoods on hydric soils

Nest site: nest typically concealed in a dense clump of spruce-fir saplings 3-10 ft above the ground, often supported by branches of multiple saplings

Special requirements: scattered, tall, standing live or dead wood in nesting and foraging areas

Territory or home range size: highly variable, depending on proximity of nest site to wetlands, estimated at 10 to 430 acres from radio telemetry

Diet (breeding season): primarily aquatic macroinvertebrates captured by probing or flicking aside dead vegetation; also flying insects and berries

Associated species: magnolia warbler, Nashville warbler, northern waterthrush, olive-sided flycatcher, Swainson's thrush, moose, snowshoe hare

Recommended Forest Management Practices: When conducted in the appropriate context, some methods of timber harvesting can enhance habitat quality for rusty blackbirds and associated species. However, conservation benefits may be low in areas where suitable habitat occurs naturally. For more discussion of where to create and sustain habitat, consult the complete guidelines. The following table summarizes options for creating the desired, stand-level conditions.



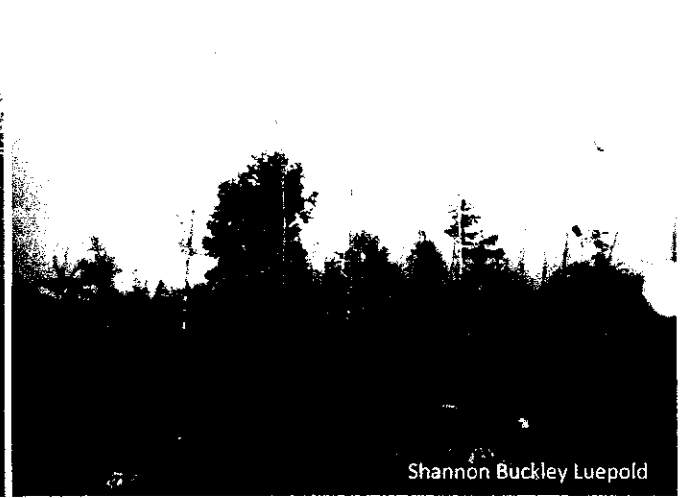
Adult rusty blackbirds in breeding plumage: charcoal gray female on left, glossy black male on right.

Starting Condition	Objective	Management Options	Desired Condition
Mature softwood stand High canopy closure	Regenerate stand	Overstory removal with retention of scattered dead and/or live trees Shelterwood harvest Clearcut harvest with retention	Thick regenerating stand of mixed or softwood saplings (1.5- 2 in DBH) measuring 8-12 ft in height Open canopy Residual overstory \geq 13 ft, composed of live and/or dead trees, dispersed individually and in clumps Softwood patches of saplings to small poles with basal area \geq 85 ft ² /acre

Field Guide to Managing Rusty Blackbird Nesting Habitat



Winter harvest in a mature softwood stand (l) and a mosaic of hardwood and softwood stands in various age classes (r)



Softwood regeneration with snags in background (l) and mixed regeneration with live and dead trees retained (r).



Regeneration adjacent to seep (l), nest supported by branches of multiple saplings (center), and mixed species softwood regeneration (r).

RECEIVED

FEB 21 2017

D.R.E.D

2/17/2017

Dear Mr. Simpson,

I am writing to you to express my support for ATV trails in Nash Stream State Forest. In addition to the existing trails (West Side and Kelsey Notch). I would also like to see a new Southern Connector trail developed so ATV's can get to the gas station located just south of Nash Stream Forest. I would also like to see an East-West Corridor trail developed to take the traffic off the Stark town roads. This land was purchased with public funds and should be open to all. My understanding is that there are 15 miles of gravel roads for registered highway vehicles, 47 miles of snowmobile trails and 21 miles of hiking trails. Given that the total ATV trails being requested is less than 20 miles, it is certainly in line with the amount of trails and roads allowed for other public access.

I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

Tim Goulet



Mr. Tim Goulet
1219 Lost Nation Rd
Groveton, NH 03582-4514

★ PROUD SUPPORTER OF THE USO ★



Director Brad Simpkins
ATTEN: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RECEIVED

FEB 23 2017

D.R.E.D.

2/17/2017

Dear Mr. Simpson,

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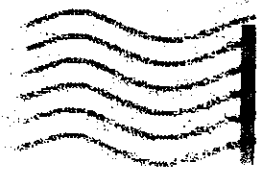
I hope you take into account that ATV riding is a growing sport with over 30,000 registered OHRV's in 2016 and that these riders need to be able to get across Nash Stream Forest to access services and get from one town to another.

Sincerely Yours,

David R. Smith
David Smith

*David R. Smith
268 Parker Rd
Whitefield N.H. 03598*

WHITE RIVER JUNCTION
VT 050 2 L
21 FEB 2017 PM



*Director Brad Simpkins
Attention: Nash Stream Plan
N.H. Division of Forests and Lands
172 Pembroke Road
Concord, N.H. 03301*

RECEIVED

FEB 23 2017

D.R.E.D.

2/17/2017

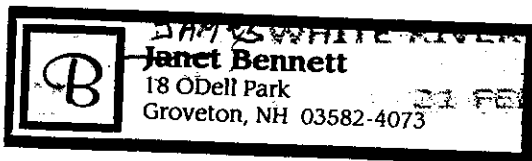
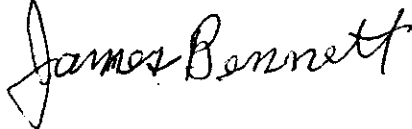
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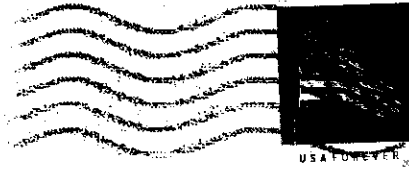
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Sincerely Yours,

James Bennett



DAVIS WHITE RIVER JUNCTION
VT 050 2 L
21 FEB 2017 PM



Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RECEIVED

FEB 23 2017

D.R.E.D.

2/17/2017


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Sincerely Yours,

Wayne Gilcris



Wayne Gilcris
415 Stratford Rd.
Groveton, NH 03582



WHITE RIVER JUNCTION
VT 050 2 T
21 FEB 2017 PM



Director Brad Simpkins
Attention Nash Stream Plan
N.H. Division of forest and land
172 Pembroke Rd.
Concord NH 03301

RECEIVED

FEB 23 2017

D.R.E.D.

2/20/2017

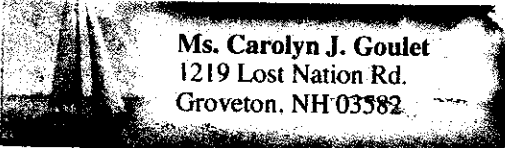
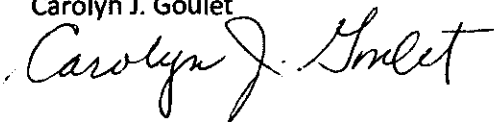
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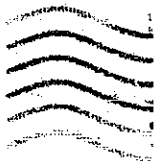
Sincerely Yours,

Carolyn J. Goulet



Ms. Carolyn J. Goulet
1219 Lost Nation Rd.
Groveton, NH 03582

WHITE RIVER JUNCTION
VT 050 2 T
21 FEB 2017 PM



Director Brad Simpkins
Attention: Nash Stream Plan
N.H. Division of Forests and Lands
172 Pembroke Road
Concord, N.H. 03301

RECEIVED

FEB 23 2017

D.R.E.D.

[date] 2/21/17

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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Sincerely Yours,

[name] Charles Fysh
[address] 35 W. Milan Rd.
Berlin NH 03570

RECEIVED

FEB 23 2017

D.R.E.D.

[date] 2/21/17

DRED

172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Plan

Dear Sir or Madam,

I am an ATV rider that enjoys getting out in the woods and sight-seeing. I do not want to see any trails in Nash Stream shut down. In fact, I would like to see more trails developed.

I respectfully request these trails be included in the new plan:

- 1) West Side Trail
- 2) Kelsey Notch Trail
- 3) Establish a new connector trail to allow riders to get from the West Side Trail to the gas station located about a mile SW of the Nash Stream entrance gate.
- 4) Establish a new east-west corridor trail along the southern boundary of Nash Stream forest so riders can get off the roads.
- 5) Extend the east-west corridor trail to the eastern boundary of the forest along the existing snowmobile trail at some point in the future.

The entire footprint of these ATV trails is around 70 acres or less than ¼ of 1 percent of the 40,000+ acres in the forest. In fact, if you add up all of the trails, roads and camps in Nash Stream it comes to just over 500 acres, which means that over 98% of the forest land would still be open, even with these new ATV trails.

This land was purchased with money from the residents of New Hampshire and should be available to be used by all residents.

Respectfully,

[name] Charles L. Fysh

[address] 35 W. Milan Rd.

Berlin, NH 03570

RECEIVED

FEB 23 2017

D.R.E.D.

[date]

2/21/17

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

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Nash Stream was purchased with public funds and therefore should be open to ALL user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future. Specifically I would like to see a connector from the West Side trail to the gas station on Northside Road.

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With over 19,000 New Hampshire residents riding ATV's, it's time that our public land gets used to fill in the gaps between our private landowner's who have been the most supportive of our sport.

Sincerely,

[name]

Charles Fysh

[address]

35 W. Milan Rd.

Berlin, NH 03570

RECEIVED

FEB 27 2017

D.R.E.D.

2.22.2017

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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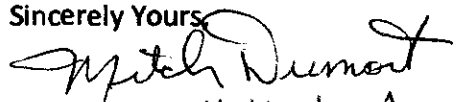
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Sincerely Yours


500 Hillside Ave
Berlin NH 03570

2-22-2017

REC-

FEB 27 2017

D.R.E.D

DRED

172 Pembroke Road
Concord, NH 03301

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Respectfully


700 Hillside Ave
Berlin NH
03570

RECEIVED

FEB 27 2017

D.R.E.D.

2-22-2017

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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Sincerely,


700 H. K. L. Ave
Berlin NH 03570

Mark Tello

Subject:

NASH STREAM

RECEIVED

February 23, 2017

FEB 27 2017

D.R.E.D.

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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Sincerely Yours,

Mark J. Tello *Mark J Tello*

23 Townline Road

North Stratford, NH 03590

RECEIVED

FEB 27 2017

D.R.E.D.

February 23, 2017

Brad Simpkins, Director
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301
Attention: Nash Stream Plan

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Sincerely Yours,

Ann Standke
23 Townline Road
Stratford, NH 03590

RECEIVED

FEB 27 2017

D.R.E.D.

[date] 2/24/17

NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RE: Nash Stream Forest Plan

To whom it may concern:

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Sincerely,

[name] *Leo M Chabot*
[address] *682 Northside Rd*
Stark NH 03582

RECEIVED

FEB 27 2017

D.R.E.D.

[date] 2/24/17

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

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Sincerely Yours,

[name] Theresa Chaloux
[address] 682 Northside Rd
Stark NH 03580

Theresa
Chaloux

February 24, 2017
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

RECEIVED

FEB 27 2017

D.R.E.D.

Nash Stream Forest Plan

To whom it may concern:

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Nash Stream was purchased with public funds and therefore should be open to all user groups. I am in support of keeping all current ATV trails and also want to see more trails developed in the future. Specifically I would like to see a

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Sincerely,

President

Sunset Riders ATV Club

Dave Baldassara

121 Jaspers
Berlin NH
03570



File Code: 5440; 1920
Date: February 24, 2017

RECEIVED

MAR 01 2017

D.R.E.D.

Brad Simpkins
Director
Attn Nash Stream Plan
NH Division of Forest and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

Thank you for the opportunity to review and comment on the draft Nash Stream Management Plan. As the agency administering the conservation easement, I am glad to see that the management plan is consistent with the intent of the easement, to assure perpetual public use and protection of the Nash Stream Tract while providing a sustained yield of forest products.

The draft management plan is thorough in its consideration and protection of natural and cultural resources. I commend the regular emphasis on inventory and monitoring work to increase our understanding of the resources in the Nash Stream tract and the effects of management on those resources. If there are areas where our staffs could collaborate on monitoring to more effectively answer questions for the region, I would support that wholeheartedly.

I believe the Nash Stream Management Plan provides a balanced approach for allowing some motorized recreational access while meeting other important land management goals for the area. It is important that the established process for review by the technical committee and Council on Resources and Development be followed for all trails that are proposed to determine if they are consistent with the requirements of the conservation easement, Nash Stream Management Plan, and Land Conservation Investment Program (LCIP). As indicated in the management plan, I concur it is critical to continue monitoring of trails and the effects of use on natural and cultural resources to ensure allowed use is consistent with the goals of the conservation easement.

One suggestion for the final plan or future iterations is to consider the benefits of discussing climate change more directly. The draft plan refers to it in relation to information that will be gathered by some inventory, monitoring, and research, which indicates a recognition of the role climate change may play in resource management in coming decades. The plan does not say how the State is currently considering climate change, based on the best available scientific studies, in its management of the area. Nor does it discuss how changing temperatures and precipitation levels, and resulting changes in natural and cultural resources, may affect management activities in the future. For example, on the national forest we increase the size of many stream crossings to accommodate increased stream flows during intense precipitation events.



I appreciate all of the hard work that has gone into managing the Nash Stream tract in a comprehensive, sustainable way to meet the goals of the conservation easement, and look forward to continuing to provide assistance and support as needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Clare R. Mendelsohn", with a long horizontal flourish extending to the right.

CLARE R. MENDELSON
Deputy Forest Supervisor

cc: Jen Barnhart, Craig Young

RECEIVED

FEB. 26, 2017.

MAR 01 2017

DEAR DIRECTOR SIMPKINS,

D.R.E.D.

My name is Bob Rodrigue, I AM 61 YEARS OLD AND WAS BORN AND RAISED IN THE BEAUTIFUL AND PRECIOUS NORTH COUNTRY OF NEW HAMPSHIRE. I LOVE AND APPRECIATE THE PRIVILEGE OF ENJOYING THE BEAUTY AND SERENITY OF OUR GREAT NORTH WOODS. I AM A BELIEVER THAT THE NASH STREAM FOREST BELONGS TO EVERYONE, NOT ONE SPECIAL INTEREST MORE THAN ANOTHER. IT BELONGS TO THE NATURE LOVERS AND HIKERS, THE CAMPER AND SPORTSMEN, THE LOGGE THE SNOWMOBILE AND OHRV ENTHUSIASTS, AND ANYONE ELSE WHO WANTS EXPERIENCE WHAT NASH STREAM HAS TO OFFER.

I AM WRITING TO SUPPORT THE PROPOSED NASH STREAM FOREST PLAN SUSTAINING THE 2 CURRENT OHRV TRAILS AS WELL AS THE DEVELOPMENT OF EAST-WEST CORRIDOR OHRV TRAIL. THE OHRV COMMUNITY IS ALWAYS RESPECTFUL OF ALL ENVIRONMENTAL MANDATES AND CONCERNS. I THINK THAT 2% OF THE ENTIRE FOREST IS NOT UNREASONABLE FOR THE MOTORIZED COMMUNITY TO REQUEST FOR THEIR FORM OF RECREATION. I ASK YOU TO CONSIDER MY SUPPORT FOR THE PROPOSED PLAN AND I THANK YOU FOR YOUR TIME AND CONSIDERATION.

SINCERELY,

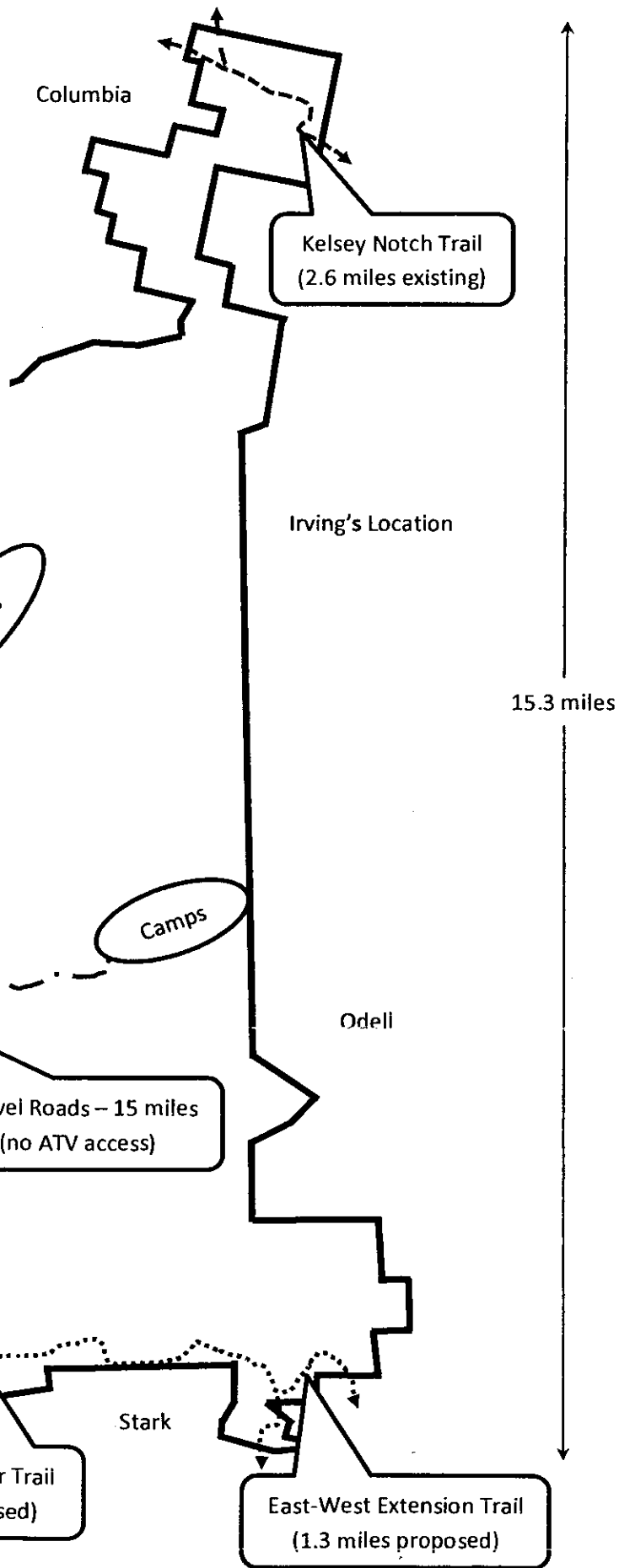
Bob G. Rodrigue

394 MAIN ST.

BERLIN, NH 03570

← 8.2 miles →

Nash Stream Forest – Public Use Footprint		
Use	Miles	% of Forest
All gravel roads	66.5	.71%
Snowmobile trails	47.0	.36%
Hiking trails	21.3	.03%
West side ATV trail	8.0	.07%
Kelsey Notch ATV trail	2.6	.02%
So. ATV trail (Proposed)	1.3	.01%
East/West Trail (Proposed)	6.3	.06%
East/West Extension (Prop.)	1.3	.01%
91 Camps (private & state)		.06%
Total acres public use	528ac	1.3%
Total acres remaining	39,485ac	98.7%
Email questions to: feedback@nashstreamforest.com		



Stratford

Columbia

Kelsey Notch Trail
(2.6 miles existing)

Irving's Location

15.3 miles

Camps

Camps

West Side Trail
(8.0 miles existing)

Gravel Roads – 15 miles
(no ATV access)

Odell

Groveton

Southern Connector Trail
(1.3 miles proposed)

East-West Corridor Trail
(6.3 miles proposed)

Stark

East-West Extension Trail
(1.3 miles proposed)



RECEIVED

MAR 02 2017

D.R.E.D.

February 28, 2017

Director Brad Simpkins
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd.
Concord, NH 03301

Re: Nash Stream Management Plan

Director Simpkins,

Thank you for the opportunity to comment on the Draft Nash Stream Forest Management Plan. Founded in 1911, the New Hampshire Timberland Owners Association (NHTOA) represents forest landowners and the forest products industry in New Hampshire. This sector of New Hampshire's economy is vibrant and represents the third-largest sector of manufacturing in the state. The forest products industry in New Hampshire employs more than 10,000 people directly with an annual payroll of more than \$330 million.

The NHTOA will provide one general comment and three specific comments.

General Comment

Forest Management on Nash Stream Forest.

As the background narrative of the plan documents, the Nash Stream Forest has always contributed to the state's forest products economy, and the NHTOA is pleased to see the N.H. Division of Forest and Lands (the "division") recognize this importance. The NHTOA is especially pleased to see this parcel's economic contribution to the forest economy appear as the first item on the list of reasons why the residents of New Hampshire purchased this parcel in section

1.3 WHY THE STATE PURCHASED THE NASH STREAM FOREST.

As an observer, and now active participant, in the Nash Stream Forest planning process, it is clear to the NHTOA that the most controversial issue facing the division during this round of planning is motorized recreation. The NHTOA does not have an opinion on the use of motorized vehicles on the Nash Stream Forest, but we have two concerns as we watch this debate.

1. Dilution of principle goals - The NHTOA does not want to see one of the principle goals of this property's acquisition (i.e. contributing to the forest economy through the sale of wood products) diluted to accommodate other users. We do not believe recreational uses should overshadow the division's ability to manage this property for forest products.

2. Land allocation or "State Forest zoning" - Similarly, the NHTOA does not want to see the division decide it would be easier to accommodate various interest groups by creating

54 PORTSMOUTH ST., CONCORD, NH 03301
603-224-9699 · FAX 603-225-5898 · WWW.NHTOA.ORG

Growing Leadership for New Hampshire's Forests

specific management “zones” within the division’s forests. Timberland management coexists with motorized recreational users and almost all other traditional recreational uses (e.g. hunting, hiking, fishing, etc.). The NHTOA believes the division has the expertise and experience to manage this forest as a single parcel, with mixed uses occurring across the landscape where appropriate. We do not want to see the state begin allocating or setting aside sections of Nash Stream Forest only for specific uses to the exclusion of other uses. Such a strategy inevitably pits user groups against each other as they scramble for acreages.

Specific Comment

Harvest Activity

The NHTOA appreciates the high priority that active forest management is given in the proposed management plan, but we are concerned the division is not being proactive enough. We recognize the average age class of timber across the property was relatively young at the time of acquisition, but that was 29 years ago. Now many of these timber stands are approaching a size and age class requiring more active management, and we are concerned the division’s conservative management proposal will not keep pace with the acres of land requiring management.

This can be seen in the proposed target age classes and timber rotations in tables 14 and 15 on pages 101 and 103. The NHTOA does not believe annually managing less than 1 percent of the suitable base is adequate to keep pace with the acreages as they mature.

Moreover, the NHTOA believes these targets incorrectly favor biological maturity over market maturity. If a primary reason for owning and managing the property is to provide an economic contribution to the forest economy, we believe these targets and rotations should be more reflective of market maturity.

Lastly, we believe this conservative approach will be problematic for certain species found on the property, such as Spruce and Fir, and will negatively impact other resource values on the property, such as early successional habitats. At the proposed rate of management, we believe that over time the Nash Stream Forest will begin to resemble other public lands in northern New Hampshire with stands of overstocked, over-mature timber and a dearth of early and mid-successional habitat. To avoid this, the NHTOA advocates the division begin initiating more regeneration harvests to remove the poor quality stems and enhance crop tree growth.

Specific Comment

Data/Planning

Also referenced in section 1.3 **WHY THE STATE PURCHASED THE NASH STREAM FOREST** of the draft plan are the original justifications for state timberland ownership authorized by the General Court in 1881. Again, first on their list is a commitment to forest management,

- 1. State-owned forests would serve as demonstrations of sound forestry principles*

Although, the silvicultural techniques and our understanding of the science have evolved since 1881, one thing every forester needs to perform their job is good basic information, such as volume per acre by species and product. Given the size of this tract, estimated growth and stocking data from the U.S. Forest Service's Forest Inventory Analysis (FIA) is probably adequate, but good maps showing where timber is located and good maps of infrastructure -- roads, bridges, etc. -- for maintenance needs is essential. The NHTOA encourages the division to provide adequate budgeting and staffing to give its land managers the tools they need to manage the property and fulfill that early justification. Again, the NHTOA wants to avoid the pitfall many public land management agencies fall into: well-written but underfunded management plans that can't be executed.

Specific Comment
Suitable Base

Regarding objective #2 on page 95,

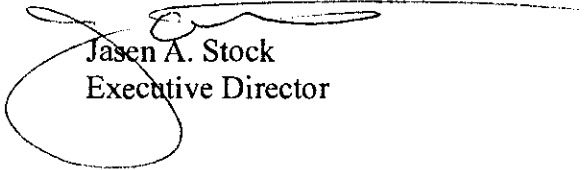
Determine the commercial forest area suitable for timber management.

The NHTOA applauds the division in accomplishing this goal and refreshing it for the current management plan. The NHTOA also supports the division's continued use of scientifically proven Best Management Practices in determining buffer distances and no-harvest areas. The best management practices described in "New Hampshire Best Management Practices for Erosion Control on Timber Harvesting Operations" (2016; published by the division and the University of New Hampshire Cooperative Extension) have been shown to protect sensitive areas (e.g. riparian areas, wetlands, steep slopes, etc.) and allow sustainable forest management.

With respect to the division's prohibition of managing any land above 2,700 feet in elevation or on slopes greater than 35 percent, the NHTOA requests the division reconsider this mandate. As timber harvesting technology evolves and our forests face new and more devastating forest health challenges (e.g. invasive pest outbreaks), the NHTOA believes it is irresponsible for the division to close the door on managing these previously management-restricted lands should the need arise.

Again, the NHTOA appreciates the opportunity to comment on this proposed plan and we welcome any opportunity to provide additional comment or provide more information to assist the division.

Thank you,



Jason A. Stock
Executive Director



Town of Stratford

Board of Selectmen
10 Town Common Road PO BOX 366
N. Stratford, NH 03590-0366
<http://www.stratfordnh.org/>

TEL: (603) 922-5533, office
FAX: (603) 922-3317, office
stratfordnh@gmail.com

RECEIVED

MAR 02 2017

D.R.E.D.

Director Brad Simpkins
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins,

In reading the NSF Management Plan draft, we found many reasons for concern. We will confine our comment here to just four of the more egregious elements in the text.

Harvest

It is evident that the technical team is viewing NSF through the lens of conventional commercial forest management. While we applaud the nominal desire to utilize crop rotations that are somewhat longer than has become locally typical on private landholdings, we nevertheless reject the implication that one of the purposes of a state forest is to produce a maximum yield of primary goods. Furthermore, our area has a surplus of young forest, even-aged forest, and regenerating forest. What there is a great shortage of are extensive older forests with their repositories of genetic material, habitat for dependent species, and the quality of forest experience only they can provide human visitors. Moreover, production of primary goods results in notoriously low economic yields for the producers; if the State's strategy is to use NSF as an economic engine for the North Country, then it can generate far more jobs, opportunities, and diversity by focusing on small, vertically integrated, locally based businesses that produce secondary and tertiary goods and operate with minimal carbon footprints and appropriate technologies. Such a business plan would also have the corollary of retaining and attracting creative young residents to our communities, something that is badly needed in the North Country.

Roads

The draft shows some restraint on immediately opening NSF to more use by motorized vehicles, but that restraint is, at best, Milquetoast in nature. There is no strong statement noting the inherently destructive nature of motorized vehicles, the carbon footprint they impose, or the impact they have on other users of the forest, both human and non-human. The sections relating to roads and road building both in the infrastructure and the forest management chapters are couched in ambiguous, but positive, terms of 'improvement'. In the absence of firmly stated limits, we can only assume this to mean providing for greater capacity and higher speeds, which compounds the negative aspects of roads without serving the easement's intended purpose of preventing development – in fact, just the opposite. It is of interest that the word 'roadless' does not appear once in the text. It is also of interest that hiking trails are few, poorly developed, and partially consist of motor vehicle corridors.

Education

As has been noted before, 'education' appears in the draft only twelve times. This compares to 111 appearances of 'harvest'. This imbalance clearly shows that the technical team's objective was to commercialize the forest as far as possible for conventional forestry interests rather than to utilize the forest for a more general public good. Locally, statewide, and nationally, we have a severe deficit in the


provision of educational services, especially in civics and the sciences, even more especially in hands-on programs, both practical and experimental. The absence of any program to realize the potential that NSF represents for providing such learning and research experiences in both the physical and the social sciences for local, regional, and national learners is a gross oversight and an indication of the shallowness with which the draft was written. Again, if an economic engine is sought, a vibrant educational program will retain and attract far more creative young people than will forwarders and automated timber harvesters.

Towns

It is of particular concern that the NSF management team has made no effort to contact and involve the Town of Stratford concerning the future of NSF, nor is there any mention whatsoever of working with our or any other Town, or even of informing the Towns of any activities to be undertaken. Almost one third of NSF lies within the Town of Stratford and NSF covers almost 25% of the Town's total area. The draft states that NSF expects the Towns to provide emergency policing and fire services to NSF, thus incurring expense on the Towns, but does not mention involving the Towns in NSF's management such that the Towns may participate in the decisions that affect their liabilities. This utter disregard of the Towns and their residents is very reminiscent of the high-handedness with which the Towns are treated by corporate land holders. While the NSF Citizens Committee does provide a sort of channel for interaction between Towns and NSF, it is very limited, advisory only, and heavily weighted toward non-Town members. Yet the Towns, especially Stratford, are the most severely impacted by the very policy decisions from which they are excluded.

In conclusion

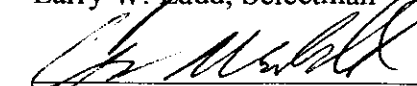
We note that the draft management plan reads exactly like a somewhat embellished, off-the-shelf and boilerplate forest management plan that might have been written by any commercial forester for any small property owner with an eye toward harvest opportunities. We feel that the largest tract of State forest land, held in trust for the residents of NH and for our surrounding regions, should be managed under a plan that shows far more imagination and foresight than is displayed in the narrow vision expressed in the draft. And we have deep misgivings about the lack of transparency in the process of preparing the draft plan up to now. We therefore call for a complete rewrite that provides stronger roles for the Towns, for educational interests, and for planners who have knowledge and experience in the areas of developing local resiliency, self-sufficiency, and sustainability for the long generations to come.



Jamie M. Davis, Chairman



Larry W. Ladd, Selectman



Clayton Macdonald, Selectman
Town of Stratford

RECEIVED

MAR 02 2017

D.R.E.D

Mr. Brad Simpkins,
Forests and Lands Division
172 Pembroke Rd
Concord, NH 03301

Nash Stream Forest,

Dear Mr. Simpkins,

My wife and I have owned a Camp located on the bog (NSB-3) since the summer of 1990. At that time, my wife was pregnant with our first child and at the invitation of one of our friends, we visited the area. We fell in love with the many features of the land and its surroundings. Although we resided in a small village, life on Main Street in Gorham where our home is located was always busy with tourists, travelers etc. We felt that our children could learn more about nature, wild animals big and small, where they could observe them safely in Nash Stream Forest.

Over the years, our children made many trips to our Little Camp, spending overnights, fishing, hiking, berry picking... Rules were relaxed at Camp. There were no TV, radio or other distractions. It was a time when our family could get together and when our focus was toward each other and the surrounding nature. Our children learned to entertain themselves without all the gadgets that were later introduced in our society.

In at least two separate Winters, we rented snow machines to access our Camp to experience it in a totally different environment. More recently, my wife and I have cross-country skied into our camp, an 8.3 mile one-way trip.

I understand that there is a tremendous push to allow 4-Wheelers into Nash Stream Forest. We strongly feel that allowing them access to the road leading to the camps would change forever the character of the Nash Stream Forest. I have been approached in Gorham to sign a petition to limit 4-Wheelers' access to the town roads. I disagreed with the petitioners because I felt that Gorham's character is designed to accommodate tourists in activities that are best suited for the locale. That is not the case with the Nash Stream Forest.

In our experience, we have never felt threatened by snow machine operators when we were either using snow machines or cross-country skiing on the access road. The only traffic during the winter is by snow machine, snowshoes or cross-country skis. During spring, summer and fall, there are hunters, hikers, camp owners who travel the road by foot and by car/truck. Rarely if ever have we seen someone speeding on the road or otherwise acting recklessly or even unreasonably. We are very concerned that it will be very difficult to police the use of 4-Wheelers. It will add a whole dimension of concerns about the age of the operators, their sobriety, not to mention the conditions of the road with the increase usage.

I urge you not to open the Road to the use by 4-Wheelers. Thank you for your consideration of our concerns.

Thomas J. Cote, Esq.



Josee L. Bourbeau. MD



RECEIVED

MAR 02 2017

D.R.E.D.

Dear Director Simpkins

My name is Buddy Dionne. I have been riding ATVs for 33 years and am now almost 65 years old. Through the years my whole family has enjoyed this recreation. Everyone in my family has their own ATVs, including my four grand children. We ride up north frequently throughout the year summer and winter. We understand that Nash Stream land was purchased in part for sport and recreation. The fact that there was no ATV restrictions placed on this land should be in our favor.

I'm sure you understand the great economic impact on the North Country that the ATV community has brought. That doesn't even figure in what it brings into the state. I think that at this point the North Country has been relying on ATV business for most of the year. My hopes are that this continues for years to come.

I understand we are looking for 6.3 miles of trail. I do believe the selected route has limited impact on the outer end of the Southern borders. So far the two other trails we have opened have proven to be successful. I just feel if this land was purchased with state money that we all should get a chance to enjoy it.

I belong to a club and we teach responsible riding and it seems to be working. We teach safety courses for the kids up and coming. With the new law that ATVers will need to join a club we will even have a better impact.

Because of my age I can't hike all over the place to enjoy the outdoors. Riding ATVs gives me this opportunity. I want to thank you for taking the time to consider us seniors.

Sincerely,



Buddy Dionne
26 LaFrance Avenue
Nashua, NH 03064

REC'D

MAR 03 2017

D.R.E.D.

February 28, 2017

Brad Simpkins, Director
NH Department of Resources and Economic Development
Division of Forests and Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

I am writing in regard to one particular aspect of the draft Nash Stream management plan. I do not think you should approve any additional ATV trails within the Nash Stream Forest.

As you state, one of the original primary reasons for acquiring the Nash Stream Forest was to "...provide continued public access for traditional recreation uses." Despite their popularity with some recreationists ATVs are not a traditional recreation use. The area has traditionally been used for non-motorized recreation, including walking, hunting and fishing. There was limited motorized use with the addition of snowmobiling but no further motorized use that could impact forestry operations or the value "to protect natural beauty and ecological values."

Coos County has seen explosive and poorly planned growth of ATV trails, impacting residential communities and the many people who seek quiet, slower paced recreation opportunities. While ATVs meet some people's needs, there must be some areas of state owned public land in Coos County where they are not permitted.

In addition, it is questionable whether or not the existing ATV trails should have been allowed within the Nash Stream Forest. It would be a mistake to further expand ATV use without comprehensive, county-wide recreation planning. This planning must take into account social, economic and environmental values.

The argument that more ATV trails would get machines off of roads is particularly specious given that in many towns roads have been opened to ATV's with very little discussion of the impacts or any significant public input. It's a circular argument that can only be addressed with adequate planning and public involvement.

Thank you for taking the time to consider my comments.

Sincerely,



Rebecca Oreskes
49 Lorraine Road
Milan, NH 03588

Nash Stream Plan

2017

Concord Public Meeting



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
DRED Headquarters, February 9, 2017

Attendees

Name	Address	E-mail
Tom Levesque	12 Bill St. ^{Derry} NH	Sp4Racing@aol.com
Larry Go Res	1000 ^{West} Green ^{Side} Way ^{Dr} Lakes Co D ^{Or}	LARRY@LakesCoDOR.com
John LAMIER	PO Box 253 Alebertk	you have it
KEVIN EVANS	P.O. Box 213 Milan, NH.	Kevin.Evans@edwinj.edu
Karen Bennett	PO Box ¹¹¹ Ant ^{um} NHD	karen.bennett@unh.edu
Matt Leahy		mleahy@forest.society.org
Stephen Plodman	107 Haddam Road Canterbury	splodman@kairosant.org
PAUL MENZER	14 DAVIS DR Londonderry	PM HIKER @
Buddy Dionne	86 LaFrance Ave Nashua	buddy@msn.com
Don Ross	85 Dredford #5 Rd Concord 03303	comcast.net
Jan Gray	276 Queen St, Boscaman, NH, 03303	don@jansnow.com
TOM ILLIUS	18 Bow Bog Rd BOW NH	TEI@NHBINDERY.com
Krista Helwood	TNCO	kchelabok@comcast.net
Dan LaPete	731 Thier Ave Berlin NH	PAULLAPETE@hotmail.com
Michael Jensen	↑	michael.jensen@edwinj.edu
Todd Caron		
Will Guinan	DRED, DF&L	
Maggie Machinist	DRED - forests & lands	

14 attendees
+ F&L Staff

Buddy Dionne ^{Speaker} (1)
NH ATV Club

LARRY GAMES ^{Speaker} (2)
NASID STREAM CHRV
TASK FORCE

Spoke again
(10)

I'd like to speak, please
Don Ross ~~speaker~~ (3)

Spoke again
(9)

Matt Leahy
Society for Protection of Mill Forests

speaker (4)

PAL WENTZER

NH ATV club

Speaker (5)

Stephen Blackmer

Speaker (6)

Speaker again (11)

TOM LOES

TA

speaker

7

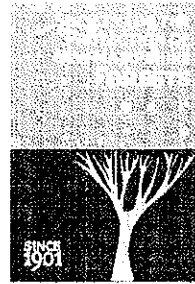
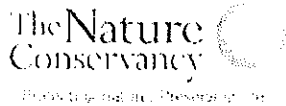
TOM Levesque speaker 8

N.H. O of Highway Vehicle Ass
Merrimack Valley Tr

Residence: Derry, NH
E. Carl, N.H.

Support proposed O.H.R.V. activity

Personal activities - hunt, fish, photo
snowmobile & OHV.



February 8, 2017

Mr. Brad Simpkins, Director
NH Department of Resources & Economic Development
Division of Forests & Lands
Attention: Nash Stream Plan
172 Pembroke Road
Concord, NH 03301

Dear Director Simpkins:

Our organizations appreciate this opportunity to present joint testimony to the Department of Resources and Economic Development (DRED) on the recreation chapter of the draft Nash Stream Forest Management Plan. Individually, some of us may submit additional testimony on other parts of the draft plan.

As the draft plan observes in its introduction, the State acquired Nash Stream Forest for three primary reasons: 1) to ensure that the property continues to contribute to forest economy through the sale of wood products, 2) to provide continued public access for traditional recreation uses, and 3) to protect the Nash Stream watershed's natural beauty and ecological values.

To protect the economic and ecological viability of the Nash Stream Forest, as well as the watershed's natural beauty, it is important to limit the fragmentation of the forest. New ATV trails create undesirable forest fragmentation --- by their construction and by their use. Unlike forest roads which may be used on a limited basis once every 30-40 years, heavily used ATV trails adversely impact the natural communities and natural systems at work in the forest. We believe this alone is a compelling argument for limiting any new ATV trails from being establishing within the Nash Stream watershed.

To protect the traditional public recreational uses of the Nash Stream Forest and watershed, limiting ATV use to the two existing trails also makes common sense. As the draft plan acknowledges, the traditional public recreational uses of the land prior to state ownership precluded motorized recreational uses aside from snowmobiling. For many decades prior to the state's acquisition of these lands, their private owners invited many public uses including fishing, hunting, hiking, snowshoeing, cross country skiing and snowmobiling. These multiple uses fit with the prior landowners' management objectives to manage the land as a working commercial forest. Four wheeled motorized use by the public did not fit with the forest management

objectives of the land, and was therefore prohibited. The initial management plan for Nash Stream adopted by DRED in 1995 precluded ATV use for these reasons.

We believe it would be most consistent with the original purpose of the state's acquisition of Nash Stream Forest to limit ATV use of the property to the West Side Trail and the Kelsey Notch Trail on terms approved by the NH Council on Resources and Development on December 8, 2016. We support Objective 1 and Objective 3 in section 10.3.4 of the draft plan. However, we oppose Objective 2.

We believe that the new management plan should limit ATV use of Nash Stream Forest to the two existing ATV trails. We urge DRED to conclude that no new ATV trails should be contemplated for the planning period covered by the draft plan.

Our organizations are committed to working with DRED, Ride the Wilds, local ATV clubs, landowners, and the many other interested stakeholders in developing a long term master plan for recreational trail use in Coos County. This should include all recreational trail stakeholders. We are ready to roll up our sleeves to work with all other interested stakeholders to find common ground on where recreational trails --- including ATV/UTV trails --- can and should be appropriately located.

Sincerely,

Jim O'Brien

Director of External Affairs
The Nature Conservancy
jim_obrien@tnc.org

Susan Arnold

Vice president for Conservation
Appalachian Mountain Club
sarnold@outdoors.org

Will Abbott

Vice President Policy
Society for the Protection of NH Forests
wabbott@forestsociety.org

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Mr. Simpkins

I ask that you consider the less physically fit people in our state. There are many avid ATV riders, who are in their 60's, 70's, or even 80's who still want to be able to experience the Nash Stream Forest. In their younger days they were able to enjoy the wilderness by being able to hike into the back woods or climb to mountain peaks. Now being less physically able, they are not able to enjoy these hard to get to areas. An ATV or other off road vehicle gives them the access they crave.

We all see that there is a small portion of parking lots that are designated for handicap parking. Many of New Hampshire's natural outdoor attractions in the state have special paths to enable access for all.

Why shouldn't there be a small portion of the Nash Stream set aside to a few ATV trails? Specifically, keep West Side and Kelsey Notch trails and approve new trails: Southern Connector ATV Trail between the West Side trail and the southern boundary of Nash Stream Forest so riders can gain access to local trails and gas. Allow the construction of a new 6.3-mile East West Corridor ATV Trail that will run along the southern boundary of Nash Stream Forest and exit onto Percy Road, eliminating the need for thru traffic to go through Stark village. Include an option for allowing future construction of a 1.3-mile East West Corridor Extension ATV Trail that will exit onto Bell Hill Road.

Sincerely,
Paul Mentzer
14 Davis Dr
Londonderry, NH 03053

Input for Nash Stream Forest Plan

Larry Gomes – Nash Stream OHRV Task Force

February 9, 2017

My name is Larry Gomes and I am the designated spokesperson for the Nash Stream OHRV Task Force, which represents the New Hampshire Off-Highway Vehicle Association – a state-wide organization consisting of 21 OHRV clubs; the North Country OHRV Coalition consisting of 17 organizations made up of local OHRV clubs, snowmobile clubs and Chambers of Commerce and also known as the founder of the Ride-the-Wilds trail network; the Metallak ATV club on the north side of Nash Stream Forest; the North Country ATV club on the west side of Nash Stream Forest and the Milan Trail Huggers ATV club on the south side of Nash Stream Forest.

As a long-time visitor to Nash Stream Forest, I have the utmost respect for what was done to purchase and preserve this property. As a hiker, I have enjoyed the vistas from Sugarloaf and Percy Peaks. I have taken family members to wade through the pools at Pond Brook Falls. In the winter, I have shared many picture perfect snowmobile rides through the Nash Stream trails with family and friends.

As a volunteer with the Groveton Trailblazers snowmobile club, I helped build many of the bridges and performed maintenance on the trails that wind through the forest. I also initiated and lead a four-year long effort to install over 600 sign posts on the trail system to keep trail signs off the trees in the forest. My wife and I spent two years building 60 carved wooden signs that are put up each winter in the Forest directing snowmobilers to their destinations. So Nash Stream Forest is a special place for me, my family and my friends and we care deeply about its future.

When you look at a map of central Coos County with an outline of the boundaries of the Nash Stream Forest, you cannot help but be struck by its size. From south to north the forest stretches over 15 miles, from Rt.110 in the south to within 1.6 miles of Rt. 26 in the north. It is impossible to go from east to west without crossing through this great forest. This presents a challenge of accommodating public use while still preserving the character of the forest.

I believe there is a solution that meets both of these goals and it was pioneered by others before me with the establishment of ATV trails along the perimeter of Nash Stream Forest.

In the north, the Kelsey Notch ATV trail runs along existing logging roads and snowmobile trails within a mile of the northern-most forest border. In the west, the West Side ATV trail runs along existing logging roads and snowmobile trails within a mile and a half of the western-most border.

In the south, we have proposed three ATV trails. The Southern Connector trail would run 1.3 miles along an existing snowmobile trail and would allow riders on the West Side ATV trail to reach gas and lodging services located south of Nash Stream Forest.

The East West Corridor trail would run 6.3 miles along the southern border of Nash Stream Forest following several existing snowmobile trails and old logging roads. Only 4,563 feet of this proposed trail (or 3.1 acres) would run through undisturbed land.

The third and final trail we are requesting is the East West Extension which would run along an existing snowmobile trail to the eastern border of the forest.

By keeping these trails along the outer perimeter of the forest (as shown in the map that I passed out), we are able to accommodate the need for critical trail connections between Groveton and Milan while still preserving the heart of the forest for traditional uses.

Please note that the public use footprint on Nash Stream Forest is actually very small. Adding up all of the camps, gravel roads, snowmobile trails, hiking trails, current and proposed ATV trails yields a footprint of 528 acres or 1.3% of the 43,560 acres of NSF land. In other words, if all three of the proposed ATV trails are approved, 98.7% of the forest land would still remain in its natural state.

Of this 528 acres, just 70.7 acres or 16 one-hundredths of one percent of total forest land would be used for ATV trails. And this is really double counting because almost all of these ATV trails were established along existing gravel roads or snowmobile trails that were already in place before the ATV trails were opened.

In closing I would like to leave you with these thoughts. The purchase of Nash Stream Forest was made with unrestricted public funds that came from people from all walks of life. Some were young, some were old, some were able bodied and some were disabled. There were no wheeled vehicle restrictions placed on the forest by either the state or the federal government at the time of its purchase. But one of the goals clearly stated when the land was purchased was that the land must remain open for public recreation.

The citizens of New Hampshire own this land and they pursue many different forms of recreation including hiking, fishing, hunting, camping, boating, dog sledding, cross country skiing and snowmobiling. In addition, there are over 19,000 New Hampshire residents that also enjoy ATV riding.

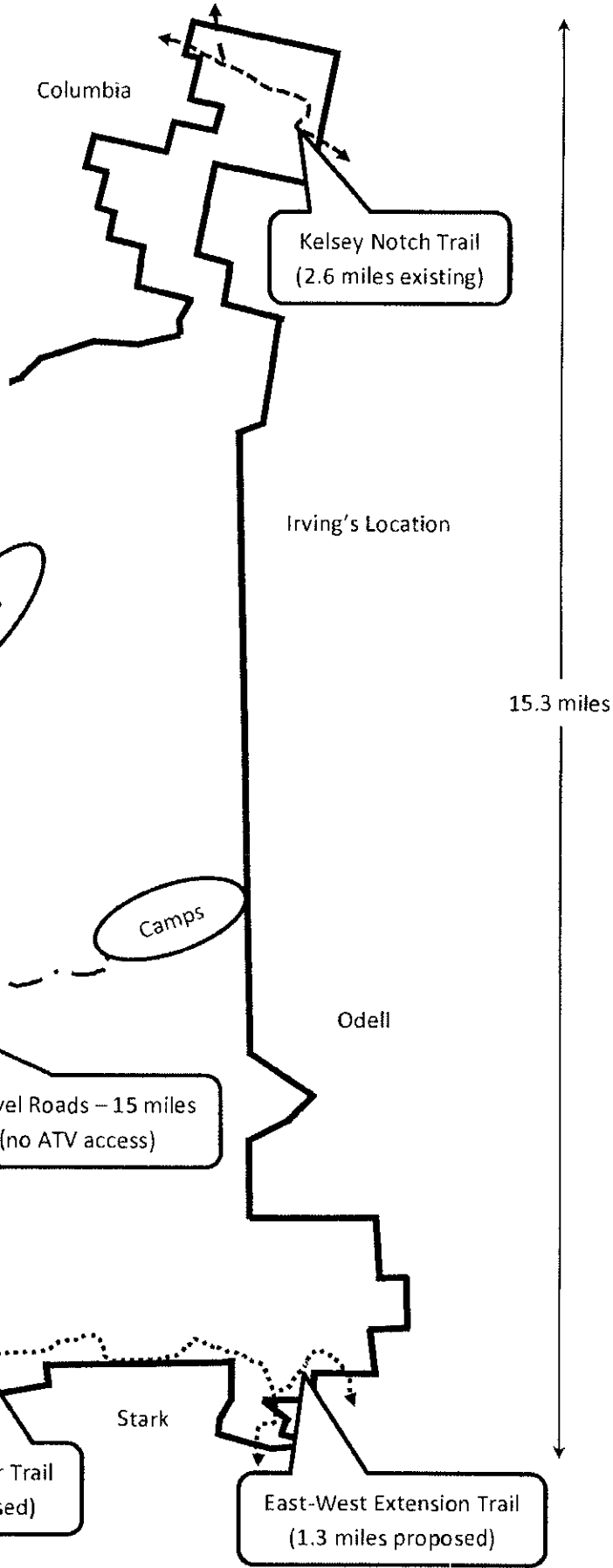
Private landowners on three sides of the Forest have stepped up to allow trails on their land creating the critical connectors between several towns that are so important for local small businesses to survive. The state must also do their part by allowing these ATV trails to cross over public land.

We ask that the Nash Stream Tech Committee and the Nash Stream Citizens Committee make the two existing ATV trails in Nash Stream Forest permanent. We also ask that provisions be made in the plan so that the three proposed ATV trails along the southern boundary of the Forest can move forward over the next few years.

← 8.2 miles →

Nash Stream Forest – Public Use Footprint		
Use	Miles	% of Forest
All gravel roads	66.5	.71%
Snowmobile trails	47.0	.36%
Hiking trails	21.3	.03%
West side ATV trail	8.0	.07%
Kelsey Notch ATV trail	2.6	.02%
So. ATV trail (Proposed)	1.3	.01%
East/West Trail (Proposed)	6.3	.06%
East/West Extension (Prop.)	1.3	.01%
91 Camps (private & state)		.06%
Total acres public use	528ac	1.3%
Total acres remaining	39,485ac	98.7%

Email questions to: feedback@nashstreamforest.com



West Side Trail
(8.0 miles existing)

Gravel Roads – 15 miles
(no ATV access)

Southern Connector Trail
(1.3 miles proposed)

East-West Corridor Trail
(6.3 miles proposed)

East-West Extension Trail
(1.3 miles proposed)

Stratford

Columbia

Kelsey Notch Trail
(2.6 miles existing)

Irving's Location

15.3 miles

Odell

Groveton

Stark

Nash Stream Plan

2017

Whitefield Public Meeting



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

1

Attendees

Name	Address	E-mail
BILL POTTER	2 PINE HAVEN RD	LANCASTER
ART GREENE	224 GRANDVIEW RD.	LITTLETON afgreene@roadrunner.com
Stephen Clorite	120 west milan Rd.	Berlin Sbclorite@yahoo.com
Don BRAY	19 MEADOWS DR.	SANBORNTON N.H. - 03269 CAMP STARBUCK
DAVID GOVATSKI	515 Bailey RD	PERSON NH 03583
TIM GOULET	1219 Lost NATION Rd	GROVETON, NH 03582
TIM BENNETT	180 de W PARK	GROVETON NH 03582
David Smith	268 Parker Rd	Whitefield, NH 03598
WAYNE GILCRIS	415 Stratford Rd.	GROVETON 03582
PAT GRAMER	492 Hamplaw St	Berlin, NH 03570
John Lamer	Posey 253, Gibran	03176 You have it
Tyler Bern	48 Rich rd	Greenfield Tyler35067@gmail.com
Donald Hamilton	11 edoll park	Groveton Donald.Hamilton@psnha.com
Bill Noons	16 martha's stratford	NH noons825@gmail.com
JOANNE NOONS	16 MARTHA'S STRATFORD	NH noons825@gmail
William Ashford	16 Martha's Way	Stratford, NH
Janine Ellold	81 Middle St	Lancaster NH cjbglrw@gmail.com
Tom Marin	124 Blanchard St.	Apt 1 Berlin NH 03574
Rene M Boutin	20 Pines St	Gorham, NH
Rebecca Driscoll	49 Lorraine Rd	Milan, NH
Seth Quarrrier	314 Burgess St	Berlin, NH

21

74 attendees + F+L staff



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands

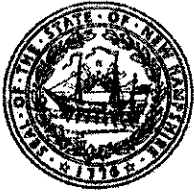


Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

Attendees

②

Name	Address	E-mail
Barb Tetraoff	Br. In Dily St	barb.tetraoff@nhd.gov
Bill Demers	136 Raycrest Dr Randolph NH	DEMERSWJ@GMAIL
Cam Bradshaw	813 6th Ave Berlin NH	cambradshaw58@ig.com
John & Helen Panazzoli	14 Country Village Rd Whitefield NH	
TED BURNS	37 Old Mill Rd No. STRAFFORD, NH	TedburnsD@netmail.com
E Harlan Currier	57 Percival N STAFFORD, N.H	Harlan, Currier@ve.com, ea
Fletcher Manley	41 Reed Rd Lancaster NH	fletcher@ncid.net
LARRY GOMES	10 OCP FLANSDEN Westboro MA 01581	
KIT KUNTZE	17 OTIS ST WHITEFIELD, NH 03598	
Leimlich Hawkins	29 Arthur White Rd Lancaster	bullfrog_03584@bcn
Mike Lynch	P.O. Box 37 N Stratford NH 03590	
Diane Holmes	95 Lancaster Rd, Gorham, NH 03581	
DAVID EVANKOW	6 Coups Garou Gorham	devankow@myfa,
Marcus Belanger	204 W. 1st St Berlin	
Abby Evankow	6 Coups Garou Rd Gorham	abbyaugstin@myfairpin
Ray Boubert	12 Cotterville Milan	
Thomas Belanger	24 Copperville Rd Milan 03588	
JIM TENNIS	DUMMEL NH	
JOE LEFEVRE	BERLIN NH	
Smile Croteau	BERNH NH 03570	
Hugh W. Lyman		



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

Attendees

(3)

Name	Address	E-mail
MIKE WADDELL	45 HAWKES GAZETHAM NH	
HARRIET BEATTIE	Lancaster N.H.	
Caxton Ball	No. Grafton, Ma.	
Will Abbott	Hobokeners NY	
Peter Riviere		
Robert Blew	Caledonia Record	calrecrd@gmail.com
Jeff Wogel	PO Box 197 Jackson NH	jwogel@anc.org
KEVIN EVANS	P.O. Box 213 Milan N.H.	
Jared Chicoine	P.O. Box 189 Woodsville, NH 03785	
George Brown	P.O. Box 263 Gorham, NH	gubrown4@gmail.com
ROBERT FILLARD	10 FIRST ST. CORNHAM NH. 03571	
Wilfred Baillargeon	17 Third St. Cornham N.H. 03571	
Richard Hunt	671 Bliss St Berlin NH 03570	
DON HOLT	45 COUNTRYSIDE AVE BERLIN NH	
Leo FORSCHAUD	465 SWEDEN ST BERLIN NH	
FRANZ KERNERAU	BERLIN S.B.	
GARY HARRIS	371 BURGESS ST BERLIN, N.H.	
Bob RODRIGUE	324 MAIN ST BERLIN NH	
Rosa Van Wie	97 Main St. Lancaster NH	
F. Smith	21 Bunker Hill Lancaster, NH	



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

4

Attendees

Name	Address	E-mail
Nancy DeCourcey	Jefferson	nwidecourcey@mp.nh.gov
STEVEN D YOUNG	LANCASTER	STEVE@YOUNG2002@YAHOO.COM
Megan Johnson	Lancaster	megejohnson@gmail.com
Ann More	Lancaster	
JAY ESPY	544-16	
OTTO WHIPLOW	NO STRATFORD	NH
Chuck Henderson	North Conway	
Rebecca S. More	Lancaster	NH
JOHN ESPY	5 BLACKBERRY LANE	LANCASTER NH
Suzanne Batchelder	247 Lancaster Rd	Gravelton
Brian Batchelder	247 Lancaster Rd	Gravelton
Pam Altomare	Lancaster	

74 attendees

+ FHL staff

LARRY GOMES

NASH STRAM TASK

FORCE

Jeremiah Hawkins

DON GRAY
CAMP IN STARK

Peter Riviere

Jamie Sayen
Stratford

JAY ESPY

TED BURNS

NORTH STRATFORD NH

JOHN
EDDY

did not
speak

Abby Evankow

ART GREENE
LITTLETON, NH

REPRESENTING AMMONDS UC
TROUT UNLIMITED

huy
Wuman

Clayton Macdonald

Kirsten Silfvénius

Cohos Trail

PAUL GREYER
Coos County Commission +
Berlin Mayor.

OTTO Whelan

Stephen Glacite
North Country OHRV Coalition

Will Abbott
SPMHR



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session

White Mountains Regional High School, February 16, 2017

Public Comment Form

Thank you for your participation!

I would like to state my opposition
to expanded ATV trails in NSF
and in opposition to the 2017 draft.

Lined area for writing comments.

Place written comments in the box provided in the back of the room or mail by March 3, 2017 to:

Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

Or email comments to nashstreamplan@dred.nh.gov



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

Public Comment Form

Thank you for your participation!

1. Limited OHRV use on the periphery of the Nash Stream State Forest would simultaneously offer a much greater return on conservation dollars by including a larger population of recreationists with minimal impact on the forest as a whole, spread the economic impacts/benefits of the Ride the Wilds trail system to communities bordering the forest, move a temporary OHRV trail off of roadways, which enhances the experience for OHRV recreationists, improves safety issues and adds longevity to the OHRV trail corridor necessary to connect communities riding areas.
 2. CORP asked for a synopsis by the Tech Team for an East/West OHRV Corridor, along with "options moving forward". This request shows that limited OHRV use is consistent with principles for the management of LCIP lands and RSA 162-C:6. The Tech Team has not offered those options nor assisted in finding appropriate trail locations.
 3. All sections of the plan using "ATV" to stand for "All Terrain Vehicles" should be changed to "OHRV" as defined by the State of NH in legislature and as adopted by NH Fish and Game and NH Bureau of Trails.
- Place written comments in the box provided in the back of the room or mail by March 3, 2017 to:

Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

Or email comments to nashstreamplan@dred.nh.gov



New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

Public Comment Form

Thank you for your participation!

Please keep ATVS out of Nash Stream.

Reserve some forest untouched.

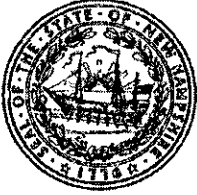
Thank you

Cam Bradshaw
813 6th Ave
Berlin NH

Place written comments in the box provided in the back of the room or mail by March 3, 2017 to:

Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

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New Hampshire Department of Resources
and Economic Development
Division of Forests and Lands



Nash Stream Forest Proposed Plan Revision
Public Input Session
White Mountains Regional High School, February 16, 2017

Public Comment Form

Thank you for your participation!

While I am concerned with an additional ATV trail and do not believe that it is conducive to creating a healthier environment, either for the land users or general global citizens, I am extremely concerned about the continued clear cutting of middle growth forests. The environmental impact of the release of carbon, the inability to absorb carbon, the impact on wildlife with limited access to old growth forest, and the desecration of an important ecosystem goes against ~~our~~ public interest and the original intent of the Nash Stream Forest holding.

Place written comments in the box provided in the back of the room or mail by March 3, 2017 to:

Director Brad Simpkins,
Attention Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Rd
Concord, NH 03301

Or email comments to nashstreamplan@dred.nh.gov



2/16/2017

Ammonoosuc Chapter (#554) of Trout Unlimited
224 Grandview Rd.
Littleton, NH 03561

Director Brad Simpkins
Attention: Nash Stream Plan
NH Division of Forests and Lands
172 Pembroke Road
Concord, NH 03301

Dear Mr. Simpkins:

This letter is written on behalf of the Ammonoosuc Chapter (#554) of Trout Unlimited (TU). Our TU chapter represents about 100 active members living in northern NH and our area of interest encompasses Nash Stream Forest. For many years our chapter members and many others we have recruited have volunteered for countless hours to assist with restoration work and to monitor fish population improvements. On many occasions students from the Lisbon Regional School Panther Adventure and Wilderness Society (PAWS) led by a chapter member/teacher have also assisted NH Fish & Game biologists with their work. This has enabled them, as well as many older adults, to have valuable learning experiences while benefitting Nash Stream Forest restoration efforts. We often use this area to inspire citizens about the importance of our natural environment.

Further comments from Trout Unlimited National:

"As most of you know, the Nash Stream watershed is the location of one of the largest and most successful stream restoration projects in the Northeast. Trout Unlimited has worked with NH Fish & Game and other partners for more than a decade to improve trout habitat in Nash Stream, largely by replacing culverts that blocked fish passage and adding large woody material to streams at a cost of more than \$1.3 million. You can find more detail on the TU Project Finder on www.tu.org by zooming in on the watershed. The restoration is working. Surveys are showing increased numbers of wild trout, and the need for stocking has been greatly reduced.

One of the reasons why Nash Stream was selected for such an ambitious restoration effort was the promise of future protection through the existing conservation easement and a management plan that set out to, 'Protect the natural qualities and integrity of the land, natural communities, native species, and ecological processes,' and 'Manage the land with as little interference as possible with natural ecological functions.'

The next Nash Stream Forest Management Plan must protect our investment in Nash Stream restoration in order to sustain a thriving trout fishery. The new management plan provides a

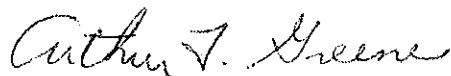
rare opportunity to improve management of streamside areas to promote the health of the trout fishery. The plan should include riparian buffers to benefit water quality, water temperature, and wood recruitment for instream habitat. Under the new plan, the NH Division of Forests and Lands is also considering an expansion of ATV trails in the watershed, which could affect water quality. It's important that Trout Unlimited members are heard during the comment period."

When reviewing the 2017 Nash Stream Forest Management Plan, we have two primary concerns: 1) the sizes of the buffers to restrict timber cutting near riparian areas of all orders of streams, and 2) the use of ATVs in the forest.

- 1) We certainly are aware how past human use of the forest has severely impacted the area by heavy timber cutting and use of the waterways to transport logs. But now climate change is stressing wildlife and plant life as well. We ask that very generous buffers be created between zones of timber harvesting and riparian areas, larger than those in the 2017 Management Plan. The current draft references best practices based on "Good Forestry in the Granite State". Due to the dramatic increase in the effects of climate change on our northern forest we feel that these standards are outdated and need revision. It is our hope that the width of the Riparian Buffer zones in the Nash Stream Watershed be increased to the maximum recommended buffer with a zero disturbance policy. We also ask that the harvesting be very closely monitored to assure these boundaries are maintained. We have seen evidence in other locations where violations are frequent and severe. This request is intended to maintain canopy cover, to reduce groundwater runoff and to maintain cool stream temperatures in all orders of streams. Low temperatures are vital to aquatic life and keeping silt runoff from waterways is critical to maintaining the health of aquatic species.
- 2) While we respect the interests of individuals in how they enjoy the forest, we have deep concerns about additional use of ATVs in Nash Stream Forest and the destruction of trails which they use. Their use creates noise, dust, mud and negatively impacts water quality where they travel due to a lack of trail maintenance. Our TU members prefer activities which have minimal impact on the natural surroundings and wildlife. The Kelsey Notch Trail is of particular concern due to its proximity to Nash Stream watershed headwaters. It appears to encroach on the riparian buffer zone and potential for damage to the watershed is high. The request for a south connector to allow access to Stark is also a concern due to increased traffic and lack of available NH Fish and Game Conservation Officers available to enforce regulations and prevent destruction to the watershed.

Please consider the wishes of our Ammonoosuc Trout Unlimited members before finalizing the 2017 Nash Stream Forest Management Plan.

Sincerely,



Arthur F. Greene, PhD
Board Member and Volunteer Coordinator
Ammonoosuc Chapter (#554) of Trout Unlimited

February 6th, 2017

To: NH Division of Forests and Lands

Re: Comment on Proposed Nash Stream Management Plan 2017 Revision

I have concerns with the new proposed management plan for Nash Stream Forest. These concerns stem from the facts that:

- When the original 1995 plan was being developed I representing the views of the NH Council of Trout Unlimited.
- I have continued to use the Forest for hiking and fishing.
- I want to do all I can to look after those things I value most highly.

Nash Stream Forest is a gem. The conditions that resulted in it ending up in public ownership were unique. The negotiations that transferred it to the public did not happen spontaneously. If not for the actions of a handful of individuals the land would now likely be in private hands. Those of us who applaud the legacy left to us must work to maintain their vision!

New Hampshire history is full of examples of citizen concern and willingness to work for practical protection of our exemplary or threatened landscapes. The Nash Stream story and your participation in this process is a continuation of that tradition.

As administrators of Nash Stream Forest, you are being asked to best provide for the future of the forest. Of course there is a desire to please as much of the public as possible. I am convinced, however, that that approach is not the proper way to proceed here. For those willing to listen I'll attempt to explain.

I can assure you that the overwhelming sentiment within the group that pulled together the original 1995 draft plan was to follow the language of the documents that conveyed the property to the public (i.e., the deed, MOU and easement.) The intent of that final plan (as well as it's legal language, I hope) was to "maintain an ecologically sustainable multiple use forest." Where competing uses negated each other ecological sustainability predominated.

Reading the proposed 2017 revision I am concerned that too much emphasis now has been given to "multiple use" and too little to "ecologically sustainable." For example, some say that ATV use within the Forest does not diminish other uses. As a hiker and a fisherman I can attest that I have heard them and I have seen their erosive effects. Also, as a fisherman I know that the shade and stream structure provided by larger wood benefits a healthy fishery and I worry that timber management favoring smaller tree size is not conducive to long term, healthy trout populations. I worry about other revisions also, but here I will mention only those I know best.

I firmly believe users now and in the future (especially in the future) will most appreciate a sustainable forest rather than one diminished by competing uses. Approval of this new revision now rests with you. I will appreciate knowing you have given it your serious contemplation.

Thank You,

Dayton Goudie
580 Partridge Lake Road
Littleton, NH 03561

Abby Evanlow

As attendance at this meeting shows - north country residents care about our forests, how we take care of them and our access to them. We all like getting into the woods and while ATVs allow wilderness access to some otherwise unable to get out, they have a much larger area of disturbance than other traditional uses - at least a mile in every direction. The noise from ATVs take away from the wilderness experience of fishermen, hunters, camp owners, hikers, equestrians, bird watchers etc even if they're well off the trail. Yes, there are 19,000 NH residents w/ registered ATVs; but there are over 350,000 NH residents who hike, and that doesn't count out of state visitors. Yes, Coos clearly needs economic development, but the Ride the Wilds trail has grown very quickly and very fast and with questionable process and results. This smaller user group is displacing other traditional users - residents and visitors alike. Even my friends who ride, don't want trails next to their homes or camps - they are disturbed by the noise and dust. Yes - it's fun to go ride the trails, but at the end of the day, we all want peace and quiet at home, camp and when we go for a walk in the woods. We need to take a break from trail building and assess the status of Coos's existing network before adding any more ATV trails.

Let's take Commissioner Rose up on his call to : "pause to evaluate the status of our trails system - particularly within the OHRV network - and the overall impacts, trends, benefits and challenges." and develop a "long term plan for the trails systems" that includes "all stakeholders, residents and communities." Yes, ATV clubs are part of our community, but just a part of it and don't speak for the north country as a whole. We're a small community up here and need to work together to grow a sustainable economy and protect our quality of life. So please don't build another ATV trail in Nash Stream Forest. Please withdraw this draft plan and craft a new one following the original intent of the founding 1995 Management Plan.

Draft Nash Stream Forest Management Plan
Public Comment Session on February 16, 2017, Whitefield, NH

Comments of Jay Espy, Percy Summer Club of NH, Stark NH

My name is Jay Espy and I am a camp owner on Christine Lake in Stark and a member of the Percy Summer Club of New Hampshire, an organization that has been in existence since 1882. I speak tonight to ask that additional ATV/OHRV use not be permitted in the Nash Stream Forest. I do not speak in general opposition to ATVs and would be glad to work with ATV organizations on future trail planning. But, having been involved in the planning effort in the late 1980's to conserve lands around Christine Lake for the purpose of complementing the State's purchase of Nash Stream, I believe that use of ATV's in the Forest is in direct conflict with the original purposes and agreements made at the time of the State's acquisition.

In 1987, when the Land Conservation Investment Program (LCIP) was created by the state, John Kauffmann, then a member of PSC, proposed the idea of granting a conservation easement on PSC land to protect the remote, mostly-undeveloped and quiet nature of the lake. He, along with leadership at DRED and the Society for the Protection of New Hampshire Forests recognized that Christine Lake was a unique resource – a deep, cold, clear lake with a forested watershed that remains virtually fully intact. Outside of the White Mountain National Forest, this is likely the largest remaining watershed of its type in the State.

Mr. Kauffmann and his family had, over many decades, acquired lands adjacent to PSC's holdings and the Nash Stream Forest tract. With guidance from SPNHF, Kauffmann and the Club began drafting conservation easements to protect the land surrounding Christine Lake. They would donate these easements if the State and US Forest Service were successful in securing similar protective measures on the 40,000 Nash Stream property, thereby conserving the entire watershed for habitat, recreation and forestry.

Late in 1988, the US Forest Service was persuaded to purchase a conservation easement on the Nash Stream tract from the owner, Rancourt Associates, thereby making it financially feasible for the State to purchase the underlying fee title to the land. This was the first federal easement of its kind anywhere in the nation. This easement required the State to develop a long-term management plan for the Forest. Mr. Kauffmann and PSC began discussions with DRED and SPNHF to develop a sustainable management plan for the property. Mr. Kauffmann and PSC agreed to grant a conservation easement conserving their holdings with the understanding that the State would develop a management plan compatible with protection of public values enjoyed from the lake. DRED leadership agreed with this vision and created a plan that sought to protect soils, water quality, views, forest diversity and quiet enjoyment of the lake and surrounding forest.

Forest harvesting would be conducted in a manner that would protect these values rather than maximize production or disturb the natural surroundings.

The original 1995 plan prohibited ATV/OHRV use on the property. Although a pilot trail on the West Side Road was allowed in 2002 and a second pilot trail to the north at Kelsey Notch was permitted more recently, adding additional trails for this purpose would certainly not be compatible with the management plan agreed to by the parties. The impact of ATVs on soils, water quality and, most importantly, the quiet use of the lake and surrounding lands, including numerous hiking trails, are clearly outside of the parameters agreed to at the time or compatible with existing and historic uses.

In 1990, John Kauffmann voluntarily agreed to forgo substantial future monetary value from his land by granting conservation easements on 290 acres. PSC followed suit in 1991, granting a conservation easement on its 374 acres surrounding all but a 200-foot strip at the end of the lake that was already in State ownership. With these donations, the entire lakeshore was conserved for the enjoyment of the public. These voluntary acts were made in good faith with the belief that the State would uphold its end of the bargain in ensuring that Nash Stream Forest would be managed as a working forest employing exemplary forest harvesting practices and as a remote, wild recreational resource.

Mr. Kauffmann and SPNHF continued their efforts to protect this remarkable watershed and its surrounding woods and trails by acquiring and donating additional lands through SPNHF. Today, more than 2,000 acres of forestland, managed for its recreational, ecological and productive values constitute SPNHF's Kauffmann Forest.

The vision of those who created the Nash Stream Forest and protected adjacent lands around Christine Lake and on nearby hills and mountains is paying increasing dividends today. During the past two decades, the Coos Trail has been developed, bringing increasing numbers of day hikers and through hikers to the area. Kayaking and canoeing visits to Christine Lake have increased dramatically in recent years. These numbers are growing with more local outfitters recommending Christine Lake as a paddling destination. Efforts made by PSC to keep the beach on the east end of the lake clean and safe have resulted in an increasing number of families visiting the beach for swimming and quiet recreation. The parking lot at the beach, which PSC built and maintains, is also seeing increasing use by hikers accessing the woods road that leads to the Coos Trail and adjacent side trails. There are many days now that the parking lot is completely full.

Mention was made at the public Citizen's Committee meeting on December 14 that the Coos Trail could be moved to accommodate both hikers and ATV riders. I disagree with this assessment. The Coos Trail traverses the course it does because of the unique resources available in the southern portion of the Nash Stream Forest. From the Percy Road, the Trail crosses between Long and Bald Mountains and in

front of Victor Head where an historic and well-maintained side-trail leads to the summit. From the summit of Victor Head, spectacular views to the Mahoosuc Mountains in Maine, the peaks of the Pilot Range and the Connecticut River valley are visible. From Victor Head, the Coos Trail traverses the course of the old Summer Club Trail, a trail that has been in use since at least the early 1900s. This trail is now enjoyed by thousands of hikers each year. Impacts associated with use of ATVs in this section of the Nash Stream Forest would not be limited to incompatible trail beds. The noise from ATVs, motocross bikes and other motorize wheeled vehicles would fundamentally alter the wild and remote nature of the experience for all other recreational users. Additionally, use of such vehicles would create problems associated with soil erosion as well as incursions on sensitive natural areas and wildlife. These impacts are simply incompatible with the original vision and agreements struck by those who worked hard and made significant personal and financial sacrifice to ensure that Nash Stream Forest would stand as an exemplary forest resource for New Hampshire.

I want to be clear that my goal is not to deny responsible ATV riding in the region. I would welcome the opportunity to work with ATV organizations to find alternative options for meeting their goals. However, as a member of the advisory committee that was a precursor to the Nash Stream Forest Citizen Committee (in the early 2000's), a camp owner and someone who hikes and maintains the trails in this region and helps keep the Christine Lake beach and surrounding lands clean for all visitors, I ask that you and your colleagues please not permit an incompatible use that will deny the intent of good faith agreements made, and forever change the nature of this unique place.

Thank you.

Input for Nash Stream Forest Plan

Larry Gomes – Nash Stream OHRV Task Force

February 16, 2017

My name is Larry Gomes and I am the designated spokesperson for the Nash Stream OHRV Task Force, which represents the New Hampshire Off-Highway Vehicle Association – a state-wide organization consisting of 21 OHRV clubs; the North Country OHRV Coalition consisting of 17 organizations made up of local OHRV clubs, snowmobile clubs and Chambers of Commerce and also known as the founder of the Ride-the-Wilds trail network; the Metallak ATV club on the north side of Nash Stream Forest; the North Country ATV club on the west side of Nash Stream Forest and the Milan Trail Huggers ATV club on the south and east sides of Nash Stream Forest.

We have reviewed the draft Nash Stream Forest Plan and have the following six recommendations:

- 1) Change the terminology in the plan from ATV/UTV to OHRV which would be in keeping with OHRV as defined in Chapter 215-A of New Hampshire law.
- 2) Include the West Side trail as permanent OHRV trail with a "designated trail" status.
- 3) Include the Kelsey Notch trail as permanent OHRV trail with a "designated trail" status.
- 4) Include provisions for a 1.3 mile long Southern Connector OHRV trail which would connect the West Side trail to the southern boundary of the Nash Stream Forest allowing access to local services and other trails.
- 5) Include provisions for a 6.3-mile East-West Corridor OHRV trail which would take OHRV traffic off the Stark Road system bypassing the historic center of Stark and the village of Percy.
- 6) Include provisions for a 1.3-mile East-West Extension OHRV trail which would follow the existing snowmobile trail to the eastern boundary of Nash Stream Forest.

As shown in the accompanying map, all of these current and proposed OHRV trails are along the outer boundaries of Nash Stream Forest, preserving the interior of the forest for traditional uses.

Note that there are two gravel roads that allow visitors access to the 91 camps located along the old Nash Bog and the Trio Ponds areas of the forest. These roads can be traveled by any registered road vehicle including cars, 4-wheel drive trucks or motorcycles, but they will not be used by OHRV's.

Adding up all of the camps, gravel roads, snowmobile trails, hiking trails, current and proposed OHRV trails, there is a public footprint of 528 acres or 1.3% of the 43,560 acres of NSF land. In other words, if all three of the proposed OHRV trails are included in the plan, 98.7% of the forest land would still remain in its natural state.

Of this 528 acres, just 70.7 acres or 16 one-hundredths of one percent of total forest land would be used for the existing and proposed OHRV trails. For almost their entire distance, these three proposed OHRV trails follow existing gravel roads, snowmobile trails or old logging roads. Of the total

8.8 mile length of these proposed trails, only nine-tenths of a mile travel through natural forest area, creating a net new impact of 3.1 acres.

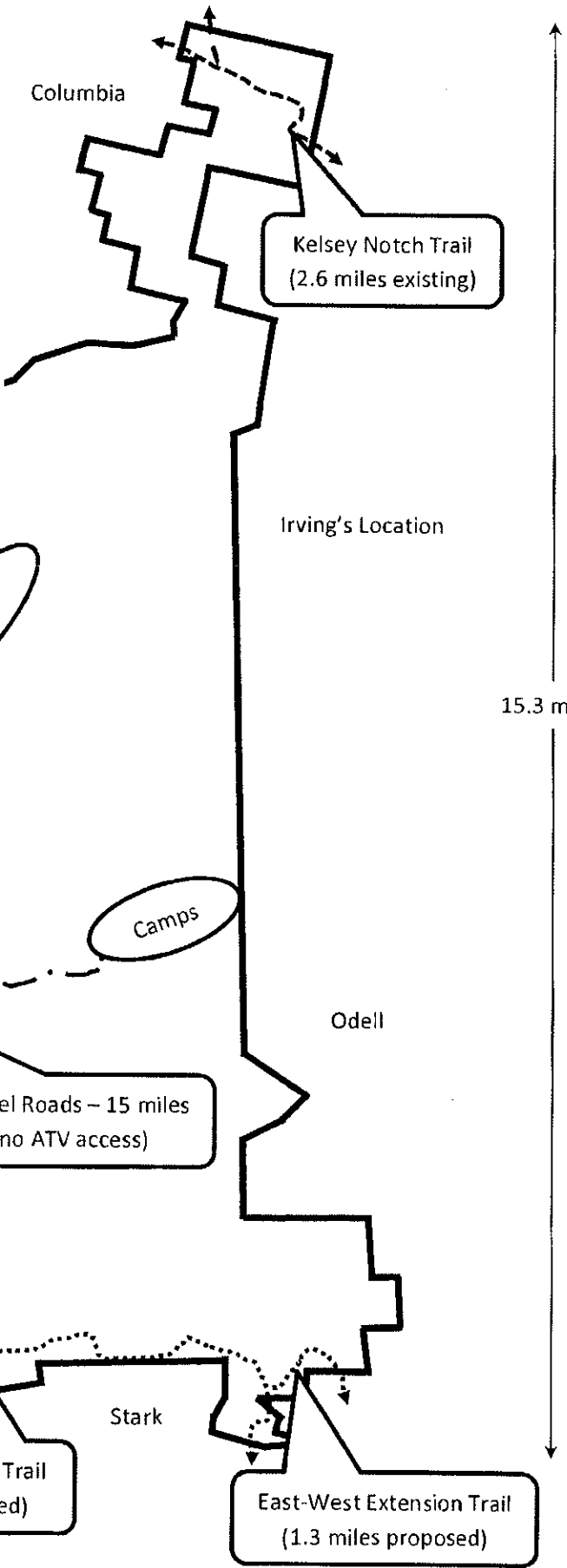
The citizens of New Hampshire own Nash Stream Forest and they pursue many different forms of recreation including hiking, fishing, hunting, camping, boating, dog sledding, cross country skiing and snowmobiling. In addition, there are over 19,000 New Hampshire residents that also enjoy OHRV riding.

Private landowners on three sides of the Forest have stepped up to allow trails on their land creating essential connector trails between several towns that are critical for our local small businesses to survive. The state must also do their part by allowing these OHRV trails to cross over this public land.

← 8.2 miles →

Nash Stream Forest – Public Use Footprint		
Use	Miles	% of Forest
All gravel roads	66.5	.71%
Snowmobile trails	47.0	.36%
Hiking trails	21.3	.03%
West side ATV trail	8.0	.07%
Kelsey Notch ATV trail	2.6	.02%
So. ATV trail (Proposed)	1.3	.01%
East/West Trail (Proposed)	6.3	.06%
East/West Extension (Prop.)	1.3	.01%
91 Camps (private & state)		.06%
Total acres public use	528ac	1.3%
Total acres remaining	39,485ac	98.7%

Email questions to: feedback@nashstreamforest.com



15.3 miles



West Side Trail
(8.0 miles existing)

Kelsey Notch Trail
(2.6 miles existing)

Southern Connector Trail
(1.3 miles proposed)

East-West Corridor Trail
(6.3 miles proposed)

East-West Extension Trail
(1.3 miles proposed)

Gravel Roads - 15 miles
(no ATV access)

Camps

Camps