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Title:

Comments: Thank you for the opportunity to comment on the proposed Peabody West Integrated Resource Project. Founded in 1911, the New Hampshire Timberland Owners Association (NHTOA) represents forest landowners and the forest products industry in New Hampshire.

The NHTOA's mission is to promote working forests, support responsible forest management, and ensure a strong forest industry. The Peabody West Integrated Resource Project aligns with this mission. This project's production of high-quality timber products and improvement of wildlife habitat diversity while considering outdoor recreational activities is a great example of multiple-use management.

Having said this, the NHTOA does have a concern over forest/habitat health and timber product production. The project area analysis currently shows no regeneration-age forest habitat. We believe the proposed project does not go far enough to correct this problem. The proposed treatment area's silvicultural treatment has 89 percent of the prescription area undergoing uneven-aged regeneration harvests (i.e. single tree selection, group selection) and 10.5 percent (240 acres) will be regeneration harvest. Putting this in the context of the entire Peabody West HMU, only 8 percent of the prescriptions directly address this issue.

The Peabody West project reflects a forest-wide concern regarding diminishing age class diversity and timber product production. In the WMNF 2020 Monitoring Report, the Forest Service recognizes its failure to meet its harvest and age class objectives. The report states, "There are a number of reasons contributing to the Forest's shortfall in meeting Forest Plan harvest and age class objectives, including budget and staffing issues." Although we appreciate the budget and staffing issues every public, government, and private organization faces, it is unclear why such a large percentage of the acres of this project (acres where the Forest Service has already invested staff time and analysis resources) are not be managed to correct these shortfalls.

Moreover, we appreciate the work the Forest Service does managing and creating recreational opportunities but, this work should not come at the expense of forest/habitat health and timber products production. According to the Monitoring Report, staff and budget resources are already stretched. Therefore, creating new recreational opportunities (back country skiing, mountain biking) when resources are already stretched will further pull Forest Service resources and energy away from the fundamental task of managing the forest in accordance with the Plan's forest/habitat health and diversity goals and production of timber products.

We are recommending the Forest Service re-evaluate their prescriptions on this project and seek to create a more diverse age class in this project and produce more forest products.

Thank you,

Jasen Stock