



**New England
Forestry Consultants, Inc.**
www.cforesters.com

December 6, 2018

Mr. Collis Adams
Administrator, Wetlands Bureau
New Hampshire Department of Environmental Services
PO Box 95
Concord, NH 03302

RE: Proposed Changes to NH Wetland Regulations

Dear Mr. Adams;

My name is Peter Farrell, and I am a resident of Alton and own forest land in Alton and Barnstead. I am also New Hampshire licensed forester # 85, and a consulting forester with New England Forestry Consultants. 2018 was my 40th year working in the woods of New Hampshire.

I have strong concerns about the proposed changes to current wetland regulations. These changes will slow, complicate, and raise the cost of administering timber sales. They will be one more disincentive to long term forest stewardship. For the sake of brevity, I will say that I concur with the recommendations and objections raised by the NHTOA and its representatives.

I would, however, like to address one general aspect included in the proposed changes, namely the issue of 'corduroy'. This term has evolved over the years from the winter of 1978 when I had to cross 200 feet of deep muck and peat soil on Beaver Brook Forest in Alton. In all its variations from logs laid cross-wise in trails, to tops laid in length-wise, to chaff from the chipper site dragged back out into the woods, the chemistry of the material has remained the same. Its wood, it's organic, and it decomposes. If my knowledge of landscape history is correct, our wetlands have been filling with organic matter since the glaciers receded 13,000 years ago.

While thinking about this hearing yesterday I took pictures of wetlands as I walked my clients' land and then my own land later in the day. I walked about 200 acres in total. If organic matter in wetlands is truly a problem, then we have an environmental crisis of epic proportions on our hands. Everywhere I looked there were trees growing, tipping, lying flat, or half submerged in water. And there was beaver activity on about half the acreage. I also searched for old trails that I know had been used, with corduroy, to cross some of these wetlands. At 5, 10, and 15 years old their surface is barely distinguishable from the adjacent wetland floor. Can you show me scientific research that indicates the processes of decomposition within those trails is so different, or so significant, as to have a measurable adverse effect on water quality or aquatic habitat in those wetlands?

I would bet with confidence that among the foresters, loggers, and landowners in this room you will find a very strong consensus in the belief that our work and management should contribute to maintaining and protecting the quality of our State's natural resources. You would also find that they would agree that water should not be muddied, diverted, cause trails to erode, or become uninhabitable for fish. But I think you would also find that they have a deep understanding of the resilience of our environment, and that we can meet those simple objectives without undue regulatory restrictions. A zero tolerance policy on corduroy is both unfair and unreasonable.

Respectfully submitted,
Peter Farrell, NH LF #85
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A circular stamp with the text "PETER FARRELL NH LF #85" is visible. Below the stamp is a handwritten signature in cursive that reads "Peter Farrell".