



Granite State Division SOCIETY OF AMERICAN FORESTERS
Representing the forestry profession in New Hampshire

Director of CEPD
USDA FSA CEPD
Stop 0513
1400 Independence Ave., SW.,
Washington D.C. 20250-0513

Subject: Comments on proposed BCAP rule as printed in the Federal Register
Volume 75, No. 25 / Monday, February 8, 2010, pages 6264-6288.

As current chair of the Granite State Division of the Society of American Foresters (GSD-SAF), I was asked to comment on the proposed rules of BCAP by the membership, as a resolution during our annual business meeting, on February 12, 2010. Our membership consists of many professional foresters and natural resource managers from throughout the state of New Hampshire, many of whom are active participants or have knowledge of BCAP.

In the proposed rules, forest landowners participating in BCAP must implement one of the following: a conservation plan, forest stewardship plan or an equivalent plan. If a forest landowner does not qualify to participate because they are lacking one of these plans, they can opt to participate in the program through an *aggregator* or *logging contractor*. An *aggregator* or *logging contractor* can qualify for BCAP by implementing rules set forth as an *eligible material owner*.

As professional resource managers, we at GSD-SAF feel that some level of professional oversight should be mandated through the program. Conservation plans should include any lands enrolled under the guidelines of a conservation easement, of which is held and overseen by a third-party requiring responsible forestry practices take place. Forest stewardship plans designated by the State Forester, should include any plan written by state licensed foresters and recognized by state forestry agencies, as a qualifying forest stewardship plan. An equivalent plan should include certificates issued by a third-party certification program such as American Tree Farm System (ATFS), Forest Stewardship Council (FSC), or Sustainable Forestry Initiative (SFI). All of these programs are recognized throughout the nation as qualified third-party certification systems and endorsed by the Society of American Foresters.

The requirement for forest landowners to have one of the three qualifying plans is a step in the right direction. This logic should also apply to *aggregators* and *logging contractors* as well. By doing so, it will help ensure that BCAP promotes the production of energy from the region's forest in a sustainable manner. If not then BCAP is nothing more than an incentive to promote expanded short term production of the energy products without the forethought of sustainability of the forests. If the same does not apply, then forest landowners, which must have an approved plan, should be reimbursed at a higher rate. This would seem to be in the true spirit of the program.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott D. Rineer". The signature is fluid and cursive, with the first name "Scott" being the most prominent.

Scott D. Rineer
Milan, NH resident
Chair of the Granite State Division of the Society of American Foresters

Cc: Executive Committee of GSD-SAF