

**Summary of Comments Received**  
**Proposed Timber Harvest Summaries – January 5, 2009 Postings**  
**Comment Period – January 5, 2009 through February 20, 2009 (extended to 2/27/09)**

On January 5, 2009, eleven Proposed Timber Harvest Summaries were posted at the DCR Management Forestry website:

(<http://www.mass.gov/dcr/stewardship/forestry/manage/ProposedForestProductsSales.htm>).

During the 45 day public comment period, DCR accepted comments on these proposed timber harvests. We received comments from 24 respondents with a total of 134 comments and/or questions.

*Please accept our regret for the belatedness of these responses.*

It is the policy of DCR, Bureau of Forestry to address public concerns regarding the projects posted for review through written response. Many comments received were general in nature and not specific to the projects posted for review. We have responded, with some exceptions, to primarily project specific comments and concerns or general topics related to posted projects.

Our responses are below, grouped by topic.

The Proposed Timber Harvest Summaries posted on January 5, 2009 (arranged by Management Forestry District and DCR property) were:

**Northern Berkshire District - 4**

**Potter Mountain East – Pittsfield SF**  
**Adams Road, Spruce – Savoy Mountain SF**  
**Torrey Road, TSI – Savoy Mountain SF**  
**Ingraham Road, Hardwood – Mt. Greylock SR**

**Central Berkshire District - 1**

**Navin Beaver Pond Lot - October Mountain SF**

**Southern Berkshire District - 3**

**Two Trail - Beartown SF**  
**Abby Road - Sandisfield SF**  
**C13 - Otis SF**

**Western Connecticut Valley District - 3**

**Spruce Mountain – Monroe SF**  
**Brown Road Spruce – H.O. Cook SF**  
**Home Fuelwood 2009 - various**

**Eastern Connecticut Valley District - none**

**Mid State District - none**

**Northeast District - none**

**Southeast District - none**

**The following eight pages list all groups and individuals who provided written comments:**

| Number | Proposed Sale/Nature of Comment  | Questions and/or Comments  |
|--------|----------------------------------|--|
| 1      | Both Emergency Salvage postings  | 1. Only ice damaged trees that affect public access or roads should be dealt with, other areas are not urgent  |
| 2      | Chandler - SBK<br>Posted 7-18-07 | 1. Has a thorough biological survey been done?<br>2. Has anyone thought about the effect on the animals?<br>3. Does the project have to go through the Otis CC?  |
| 3      | Abby Road - SBK                  | 1. Deserves a thorough biological survey prior to harvest planning<br>2. All harvest areas should get a plant and animal survey prior to harvest planning<br>3. Define "Unacceptable Growing Stock"<br>4. Are the old pines called "wolf trees"?<br>5. DCR should have a written policy that all contractors wash equipment and vehicles   |
| 4      | Statewide                        | 1. Previous DCR response to vernal pool certification process is not accurate (says "not inaccurate" but we have assumed the commenter meant "not accurate")   |
|        | All Proposed Timber Harvests     | 2. Asks that DCR supply a written statement, signed by NHESP, stating which proposed harvests were thoroughly surveyed for rare species and what type of survey was done<br>3. Is DCR saying that all harvest areas were surveyed in 2008 at least for plants?<br>4. What rare and uncommon species other than plants were surveyed in 2008?<br>5. How many new polygons of priority habitat were created in 2008?<br>6. What is DCR's process to identify all vernal pools?<br>7. How many vernal pools were submitted to NHESP for certification in 2008?<br>8. NHESP designated priority habitat and certified vernal pools are relatively meaningless on state lands so any statement related to this should not be used<br>9. Without thorough survey of plants and animals, it is misleading to state that NHESP staff will survey proposed timber harvest areas |

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|   |                             | 10. It is insufficient to notify NHESP of harvest activity after the plans are drafted   |
|   |                             | 11. Deserves a thorough biological and site survey and a site-specific management plan reviewed and approved prior to harvest planning |
| 5 | Adams Road, Spruce - NBK    | 1. Supports harvesting non-native Norway spruce and encouraging early successional habitat   |
|   |                             | 2. Concerned about new access road between Adams Road and landing as it will invite non-native herbs and ATVs                          |
|   |                             | 3. This road should be deconstructed after the harvest   |
|   |                             | 4. All harvest areas should get a plant and animal survey prior to harvest planning  |
| 6 | Navin Beaver Pond Lot - CBK | 1. Supports harvesting non-native Norway spruce and encouraging early successional habitat   |
|   |                             | 2. Deserves a thorough biological survey prior to harvest planning several times throughout the growing season                         |
| 7 | Potter Mountain East - NBK  | 1. Appreciates the clear language on silviculture in the plan  |
|   |                             | 2. NHESP designated priority habitat and certified vernal pools are meaningless on state land  |
|   |                             | 3. DCR should have a written policy that all contractors wash equipment and vehicles   |
| 8 | Two Trail - SBK             | 1. Supports harvesting non-native Norway spruce and encouraging early successional habitat   |
|   |                             | 2. Turkey Trail is inappropriate for ATV use   |
|   |                             | 3. Using the term "overmature" trees is poor terminology   |
|   |                             | 4. More large trees should be retained for wildlife and more left on the ground for structure and nutrients                            |
|   |                             | 5. How are the swamp edges defined?  |
|   |                             | 6. Will hydric soils be used?  |
|   |                             | 7. How wide will the buffer be around the swamp?   |
|   |                             | 8. Will effort be put in to determine where beavers might extend the swamp in coming decades?  |

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|    |                               | 9. What is the rationale for all beech removal?   |
|    |                               | 10. DCR should have a written policy that all contractors wash equipment and vehicles   |
|    |                               |   |
| 9  | C13 - SBK                     | 1. All harvest areas should get a plant and animal survey prior to harvest planning   |
|    |                               | 2. DCR should have a written policy that all contractors wash equipment and vehicles  |
|    |                               |   |
| 10 | Ingraham Road, Hardwood - NBK | 1. Is it wise to manage for sugar maple given the trend in climate change?  |
|    |                               | 2. Will healthy and resistant beech, black cherry and ash be maintained?  |
|    |                               | 3. DCR should have a written policy that all contractors wash equipment and vehicles  |
|    |                               | 4. All harvest areas should get a plant and animal survey prior to harvest planning   |
|    |                               |   |
| 11 | Spruce Mountain - WCV         | 1. This is an appropriate place for forestry as it complements the Monroe SF reserve  |
|    |                               | 2. Since DCR's management practices try to mimic natural processes, like the ice damage, this might be a good place to restore old growth characteristics |
|    |                               | 3. No openings over 1/4 acre should be created  |
|    |                               | 4. Deadwood should be left on the ground  |
|    |                               | 5. Legacy trees should be planned for, including groups   |
|    |                               | 6. Deadwood should be left in areas of legacy trees   |
|    |                               | 7. If there aren't enough functional snags, some might be girdled to provide future snags   |
|    |                               | 8. DCR should have a written policy that all contractors wash equipment and vehicles  |
|    |                               | 9. All harvest areas should get a plant and animal survey prior to harvest planning   |
|    |                               |   |
| 12 | Home Fuelwood 2009 - WCV      | 1. Explain what is meant by "it is expected that approximately 20 to 40 acres per year will be sold"?   |
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| 13 | General                       | 1. Is the 2-20-09 deadline for public comment on the 1-   |

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|    |                                 | 5-09 postings still in effect as a result due to the Commissioner's recent proclamations?  |
|    |                                 | 2. Describe the re-evaluation process regarding Green Certification?   |
|    |                                 | 3. What form did the re-evaluation take?   |
|    |                                 | 4. Describe and document the feedback from the public that was used when deciding to continue the program  |
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| 14 | Boxford SF - general            | 1. Past home fuelwood thinnings enabled the remaining trees to grow  |
|    |                                 | 2. The coarse woody debris leftover after harvesting helps with biodiversity   |
|    |                                 | 3. Pausing timber harvesting in the state puts undue pressure on third world countries with slash and burn methods like the rain forest                                |
|    |                                 | 4. By not wanting timber harvesting to take place in your back yard sends the message that we should get our paper products from somewhere else where you can't see it |
|    |                                 |  |
| 15 | Both Emergency Salvage postings | 1. Audubon supports the Stewardship Council decision to focus on ice damage cleanup, Asian Longhorn Beetle eradication and forest management planning                  |
|    | General                         | 2. The pause should also apply to projects listed before July of 2008  |
|    |                                 | 3. Ice storm damage clean up should be restricted to intensive use areas, any clean up in active management areas should be reviewed through the usual process         |
|    |                                 | 4. Ice storms are a natural disturbance process and help diversify the age classes of the forest   |
|    |                                 | 5. The definition of clearcutting needs to be clarified  |
|    |                                 | 6. The 1-5-09 postings include 4 projects with clearcutting totaling 166 acres and should have additional information, site visits and public comment opportunities    |
|    |                                 | 7. The postings from 2007/08 include at least 10 other projects totaling over 300 acres and should be put on hold until additional review and site visits can happen   |
|    |                                 | 8. Several projects call for the removal of certain native species, how does this fit with the goal of promoting greater native diversity?                             |

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|    |                      | 9. All of the 1-5-09 home fuelwood posting should make a distinction between sales for individual and commercial use                           |
| 16 | General              | 1. Timber sales should be posted at least 6 months prior to the marking of trees near the site and in local media                              |
|    |                      | 2. Discussions of the sale should take place on site   |
|    |                      | 3. Clear cutting should not be allowed as it is speeding up global warming   |
|    |                      | 4. State parks should not have any timber sales because they aren't tree farms   |
| 17 | General              | 1. Individual selection is superior to any other method of harvesting  |
|    |                      | 2. The use of group selection erodes the term uneven aged management   |
| 18 | General              | 1. These proposed timber sales would authorize hundreds of acres of forest to be clearcut in direct violation of the FSC certification program |
|    |                      | 2. DCR is using misleading silvicultural terminology that are all other names for clearcutting   |
|    |                      | 3. DCR logging is based on the unsupported premise that forest health depends on aggressive forms of clearcutting                              |
|    |                      | 4. The FRMPs sanctions even-aged logging practices which are ecologically harmful  |
|    |                      | 5. Supports a total commercial logging moratorium to protect the public interest and supports carefully monitored selection management         |
| 19 | General              | 1. Public meetings should take place during the daytime on weekends and on-site  |
|    |                      | 2. Trees should be marked for cutting before the proposed timber harvest plans are posted  |
|    |                      | 3. The public should be informed through email when timber sales are advertised and at the DCR website   |
| 20 | Boxford SF - general | 1. Boxford SF should be a reserve  |

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|    |           | 2. What is the justification for a timber sale in the oak/hickory portion?   |
|    |           | 3. What would be the ramifications of leaving Boxford SF in its current natural state?   |
|    |           | 4. A site-specific management plan should be developed for Boxford SF, a FRMP is inadequate  |
|    |           | 5. Why are some logging projects listed for areas without approved FRMPs?  |
|    |           |  |
| 21 | Statewide | 1. Supports DCR's efforts to provide greater transparency as it encourages participation and helps to keep DCR's process more flexible                                     |
|    |           | 2. Concerned with the definition of "site-specific" plans and the confusion that surrounds this but feels that the FRMPs or cutting plans do not meet this FSC requirement |
|    |           | 3. Doesn't support any forestry operation that are in violation of FSC standards, including clearcutting   |
|    |           | 6. The recent postings include 4 projects with clearcutting totaling 166 acres and should not move forward as they are or resemble clearcuts                               |
|    |           | 7. Other pending postings include at least 10 other projects totaling over 300 acres and should not move forward as they are or resemble clearcuts                         |
|    |           | 8. These postings should be changed to selection cuts  |
|    |           | 9. All forestry activities could be conducted as selection harvests or thinning only for several years and still meet the stated goals                                     |
|    |           | 10. Supports the focus on ice damage and Asian Longhorn Beetle eradication instead of forest management  |
|    |           | 11. The cutting of trees should not be based solely on the quantity of fiber   |
|    |           | 12. More explanation about why some cuts are occurring, why some species are favored over others, and is it for ecological or timber value purposes?                       |
|    |           | 13. If DCR maintains that it is not doing commercial harvesting, why are some planned projects called "commercial thinning"?   |
|    |           | 14. Commercial cuts of any kind should not be allowed during the pause   |

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| 22 | Statewide                    | 1. The 2 statewide emergency salvage harvests allows DCR to do any cutting wherever they want   |
|    | All Proposed Timber Harvests | 2. All of the proposed timber harvests add up to 4,789 acres and this amount of harvesting is not justified   |
|    |                              | 3. Until DCR earns the trust of the public, no cutting should be allowed except along roads or trails   |
|    |                              |   |
| 23 | General                      | 1. When does the public know when a proposed project is ready to go forward?  |
|    |                              | 2. Will the public have the opportunity to view the changes that were made in a proposal after their input is incorporated?   |
|    |                              | 3. How does the public know when a timber proposal is going out to bid?   |
|    |                              | 4. How can the public learn about when the showing date is for a timber sale?   |
|    |                              | 5. Is this information be posted on the website?  |
|    |                              | 6. Can individual citizens be put on the mailing list for these dates?  |
|    |                              | 7. Will DCR announce the time when the projects currently on hold are active again?   |
|    |                              | 8. Will there be an opportunity to comment on these proposals again when they are reactivated?  |
|    |                              | 9. How does DCR justify harvesting when the forest vision process is happening?   |
|    |                              | 10. Why hasn't DCR initiated a logging moratorium even though some people have requested this?  |
|    |                              | 11. Since timber prices are low now, isn't DCR not supposed to sell wood at rock bottom prices?   |
|    |                              | 12. Wouldn't a moratorium make economic sense?  |
|    |                              | 13. Did DCR explain to SCS that environmental group support of the three approved FRMPs with the understanding that they might change after the forest visioning process? |
|    |                              | 14. Why isn't this condition discussed in the FRMPs?  |
|    |                              | 15. Are there other references to an FRMP revision timeframe other than the stated 15 year review?  |
|    |                              | 16. Isn't it a violation of state law and Principle 7 of the green cert process to harvest timber without site specific plans?  |

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|    |                         | 17. How many acres of the 50,000 in small reserves have been officially designated and mapped?   |
|    |                         | 18. How many acres of HCVF have been officially designated and mapped?   |
|    |                         | 19. Describe the ways that the public have been advised of their rights to nominate HCVF?  |
|    |                         | 20. How can the public be assured that restrictions on reserves and HCVF can be enforced if they are not recognized by state law?  |
|    |                         | 21. Describe what percent of lands in the 4 approved district plans fall into the following categories for reserves: old growth, valley bottom, protected land, 1830s forest, rare communities, forest cover, biomap ambystomid habitat, riparian and wetland forest, interior forest, living waters |
|    |                         | 22. Describe the preharvest surveys that will be done as described in the NBK FRMP.  |
|    |                         | 23. Will they be ordered before the public comment period?   |
|    |                         | 24. Which experts will be hired to do these?   |
|    |                         | 25. Will the surveys include a search for vernal pools, listed plants, animals, birds, insects and other categories?   |
|    |                         | 26. Will the cutting plans be posted n the agency website?   |
|    |                         | 27. Explain why DCR's descriptions of forestry intensions do not fit the reality on the ground?  |
|    |                         |  |
| 24 | General - Home Fuelwood | 1. Reinstate the home fuelwood program as it is a wonderful program  |

## **Comments and Responses:**

### **General topic – Emergency Salvage and Cleanup**

1. Question/Comment: Only ice damaged trees that affect public access or roads should be dealt with, other areas are not urgent

Response: The only projects that have been approved and completed are those types mentioned in the comment. Significant work has been completed by DCR staff and contractors to improve access and alleviate safety issues in state forest and park intensive use recreation areas and trails.

2. Question/Comment: Since DCR's management practices try to mimic natural processes, like the ice damage, this might be a good place to restore old growth characteristics

Response: It is true that DCR's practices attempt to mimic the results of natural processes. Where trees were damaged enough by the ice storm to eventually cause death, relatively small openings will be created and a new age class of young trees will fill those gaps. Old growth characteristics of a forest on a small scale will not be enhanced by the ice storm. The ice storm probably will enhance the diversity of age classes on a large scale or landscape level.

3. Question/Comment: Supports the Stewardship Council decision to focus on ice damage cleanup, Asian Longhorn Beetle eradication and forest management planning (two comments)

Response: Per Commissioner Sullivan's direction, this is primarily what we are focusing on these days, in addition to activities such as drafting the Ecoregional Assessments, planning for the upcoming Continuous Forest Inventory, completing the Road and Trail Inventory, providing oversight on existing timber harvesting projects, complying with information requests and working with SCS on the 5 year Green Certification audit.

4. Question/Comment: Ice storm damage clean up should be restricted to intensive use areas, any clean up in active management areas should be reviewed through the usual process

Response: Please see response to #1 above. There have not been any actual proposed harvests related to the ice storm.

5. Question/Comment: Ice storms are a natural disturbance process and help diversify the age classes of the forest

Response: We agree, see responses to #1 and #2 above.

6. Question/Comment: The 2 statewide emergency salvage harvests allows DCR to do any cutting wherever they want

Response: See response to #1 and #4 above. No emergency harvests have gone forward, and if specific projects were being contemplated, detailed project descriptions would be posted for public comment.

### **General topic – Specific Proposed Timber Harvests**

7. Question/Comment: Abby Road sale in Sandisfield SF

Response: Answers are discussed in general topics below.

8. Question/Comment: Adams Road, Spruce sale in Savoy Mountain SF – will the new access road between Adams Road and the landing invite non-native herbs and ATVs?

Response: ATVs are prohibited from Savoy Mountain State Forest. Barriers may be installed on the access road in an effort to control unauthorized access. Non-natives herbs, as well as other non-native species including many invasive species often become established on disturbed soils and in the open. Canopy openings resulting from the proposed road and landing would be of sufficiently small size to minimize these sunny, open conditions. The access road will be of gravel construction and the landing will be seeded with a locally-obtained native conservation seed mixture. The site will be monitored for non-native species according to the North Berkshire Forest Resource Management Plan and control of invasive species will be undertaken if appropriate.

9. Question/Comment: Adams Road, Spruce sale in Savoy Mountain SF – this road should be deconstructed after harvest

Response: The proposed road is intended to provide continuing access to areas south of Adams Road in the vicinity of the proposed timber harvest. This road is planned to use geotextile, processed gravel and appropriate drainage measures to extend its lifespan and minimize maintenance.

10. Question/Comment: Navin Beaver Pond Lot sale in October Mountain SF

Response: Answers are discussed in general topics below

11. Question/Comment: Potter Mountain East sale in Pittsfield SF – appreciates the clear Silviculture language in the plan

Response: Thank you.

12. Question/Comment: Two Trail sale in Beartown SF – Turkey Trail is inappropriate for ATV use

Response: Turkey Trail is designated as an ATV trail and has been used by motorized vehicles since it was constructed by the CCCs. Its status is beyond the scope of this cutting proposal. Use of the trail by skidders will improve the trail by smoothing rutting of the trail. Water bars will be re-established to divert water from the trail and reduce any existing or potential erosion.

13. Question/Comment: Two Trail sale in Beartown SF – more large trees should be retained for wildlife and left on the ground for structure and nutrients

Response: The proposed number of trees to be retained is considered to be a minimum number. As described, some sections will have considerably more trees permanently retained. The proposed 2-3 large trees per acre exceeds the Wildlife and Structural Guidelines found in the FRMP (pg 55) which were based on published guidelines (Tubbs et al. GTR NE-118).

14. Question/Comment: Two Trail sale in Beartown SF – how are the swamp edges defined?

Response: The "swamp" is defined by the presence of water, indications of flooding if the beaver impoundment is breached and by wetland indicator plants where present

15. Question/Comment: Two Trail sale in Beartown SF – will hydric soils be used?

Response: Hydric soils will be avoided. No equipment will be allowed and, in general, trees will not be harvested, but it is possible that an occasional tree may be removed.

16. Question/Comment: Two Trail sale in Beartown SF – how wide will the buffer be around the swamp?

Response: The swamp buffer will be variable. A minimum of 50 feet will not be harvested and an additional minimum of 50 feet will have no more than 50% of the basal area removed.

17. Question/Comment: Two Trail sale in Beartown SF – will effort be put in to determine where beavers might extend the swamp in coming decades?

Response: This beaver area has existed in the same general footprint for at least 35 years and it is unlikely that the water level will be raised. It might be possible that the beaver impoundment would be extended

to the south (outside the proposed harvest area) thereby impacting the existing "Ski and Bridal Trail". A quick visual survey of the area abutting the beaver impoundment shows very little vegetation of a size suitable for use by the beavers remaining and very little indication that beavers have cut vegetation within the area to be harvested. If the harvest results in increased numbers of small trees and brush within the area used by beaver, this might provide resources to keep the beaver active in the present site (vegetation resources outside the sale area were not surveyed).

**18. Question/Comment: Two Trail sale in Beartown SF – what is the rationale for the beech removal?**

Response: Beech is a very shade tolerant species which sprouts readily from roots. Left undisturbed, it can and usually does take over a site, eliminating or reducing regeneration of other species. On this district, as in all of the northeastern United States, beech is infected with the beech scale/nectria complex which kills or severely deforms the main stem of the tree. Given its ecological characteristics, existing seedlings and saplings are released and new root sprouts are formed creating a dense stand composed primarily of beech. Since these trees are clones of the original susceptible tree, they too will eventually succumb to the disease. Occasionally, a beech which appears to be resistant is found. At least one of these trees in every clone is retained.

**19. Question/Comment: C13 sale in Otis SF**

Response: Answers are discussed in general topics below

**20. Question/Comment: Ingraham Road, Hardwood sale in Mt. Greylock SF – is it wise to manage for sugar maple given the trend in climate change?**

Response: Management on this site is intended to maintain an uneven-aged, healthy and productive stand of native trees that are well-suited to growing conditions. Sugar maple is just one of the many tree species that are exhibiting excellent growth here. Past harvesting and natural mortality have created conditions favorable to this shade-tolerant species to become well-established in the understory, midstory, and lower strata of the canopy. It is unknown exactly what effects climate change may have on the northeastern hardwood forest, or at what pace these changes are likely to occur. In the meantime, it is not prudent to shift management focus away from a major component of the native biodiversity.

**21. Question/Comment: Ingraham Road, Hardwood sale in Mt. Greylock SF – will healthy and resistant beech, black cherry and ash be maintained?**

Response: Yes. In keeping with DCR's goal of maintaining a healthy and productive stand of trees, management activities will be designed to minimize the levels of pathogens and their impact on the future forest condition. Beech bark disease, black knot of cherry and ash decline, including ash yellows, are all common forest health conditions in our region. Individual trees with these conditions may be removed from the stand and resistant trees are generally retained.

**22. Question/Comment: Spruce Mountain sale in Monroe SF – this is an appropriate place for forestry as it complements the Monroe reserve**

Response: Thank you.

**23. Question/Comment: Spruce Mountain sale in Monroe SF – no openings over ¼ should be created**

Response: This sale was originally planned as a thinning. Since this plan was written, the recent ice storm changed the on-the-ground situation. As a result, there are now natural openings created by the storm that are larger than ¼ acre.

**24. Question/Comment: Spruce Mountain sale in Monroe SF – deadwood should be left on the ground**

Response: See #23 above, there will be a lot of deadwood as a result.

25. Question/Comment: Spruce Mountain sale in Monroe SF – legacy trees should be planned for, including groups

Response: Legacy trees are part of our guidelines and will be incorporated whenever possible.

26. Question/Comment: Spruce Mountain sale in Monroe SF – deadwood should be left in areas of legacy trees

Response: See #23 above, there will be a lot of deadwood as a result.

27. Question/Comment: Spruce Mountain sale in Monroe SF – if there aren't enough functional snags, some might be girdled to provide future snags

Response: We are not allowed to create snags by girdling or any other means as dictated by established safety and liability standards.

28. Question/Comment: Home Fuelwood 2009 in WCV –what is meant by “20 to 40 acres per year will be sold”?

Response: This means that home fuel wood sales will be conducted on 20 to 40 acres with the average sale size being approximately 3 cords and covering 1 to 2 acres. These are thinnings to be sold to non-commercial users (i.e., homeowners) and not for commercial resale. The recent ice storm may impact the number of sales as the firewood supply has become quite abundant.

#### **General topic – Biological (plant and animal) Surveys**

29. Question/Comment: 15 questions making the same general comment – thorough biological surveys (plant and animal) should be done before any timber harvests are proposed

Response: We try to notify the NHESP program of all our proposed timber harvests as they are posted on our website. Since one of our posting dates is in January, it is usually impossible for them to do on-the-ground surveys, especially for plants, during the winter. In an ideal world, they would perform plant and animal surveys for all of our lands so that we would have this information before any proposed timber harvests are planned. They clearly don't have the staffing to do this which is why we ask (and fund them) to do these surveys on a project by project basis.

#### **General topic – Equipment and Vehicle Washing**

30. Question/Comment: 6 comments that DCR should have a written policy that all contractors wash their equipment and vehicles

Response: Even though this condition is not presently part of our contract standard or supplemental provision language, we have developed new contract language, including this condition that we are working to incorporate into all new contracts.

#### **General topic – Natural Heritage and Endangered Species Program (NHESP)/Certified Vernal Pools**

31. Question/Comment: Has anyone thought about the effect on the animals?

Response: Yes, this is why we ask NHESP to review all of our proposed timber harvests. They conduct an “on the ground” pre-harvest review of our proposed projects and a review of our cutting plans so that Conservation Management Practices are observed during harvesting activities.

32. Question/Comment: Previous DCR response to vernal pool certification and rare species surveys is “not inaccurate” (we think the questioner meant to say “not accurate”)

Response: The following describes our procedure for ensuring the protection of vernal pools and rare species. Each forester reviews the certified and potential vernal pool database before posting a proposed timber sale and integrates them into the plan. All vernal pools are treated according to the Massachusetts Best Management Practices (BMP) Manual. It is our policy to submit vernal pools to NHESP for certification (see #33 below). We also ask NHESP to review all our proposed timber sales (see #31 above). Though we are always seeking to improve, we believe that we are doing everything practical to insure that we are living up to this standard.

**33. Question/Comment: What is DCR's process to identify vernal pools?**

Response: Our Management Foresters follow the MA BMP Manual as a guide to determine potential, certifiable vernal pools. The BMP manual uses this definition: vernal pools are confined depressions that hold water for at least two continuous months during the spring and/or summer in most years and are free of adult fish populations. When a potential vernal pool is noted in the field, it is DCR's policy to GPS the location and report the location to the NHESP program.

**34. Question/Comment: How many vernal pools were submitted to NHESP for certification in 2008?**

Response: This question is better answered by NHESP since they are the ones that review and certify vernal pools. Since they perform surveys on all of the proposed timber harvest areas, they will take the information that is needed for certification if it meets the criteria. For example, in the Eastern Connecticut Valley District, we know of four vernal pools that were certified in the past several years. Even though the Management Forester wasn't the individual submitting, it was largely a result of the NHESP surveys of our proposed timber harvest sites. Because there were no potential or actual vernal pools discovered by Management Foresters during reconnaissance in 2008 we (BoF) submitted none for certification by NHESP.

**35. Question/Comment: It is insufficient to notify NHESP of harvest activity after the plans are drafted**

Response: Please see #32 above. Projects are reviewed twice during the planning stages and before "harvest activity" takes place. NHESP input can be integrated into the cutting plan and the project can be modified before harvest takes place.

**General topic – Definitions for Terms Found in Summaries**

**36. Question/Comment: Define "Unacceptable Growing Stock"?**

Response: For forest inventory purposes, a classification method in which a tree is rated based on the likelihood that it will develop into a tree that will be structurally sound, vigorous and yield products of high value. The three classes are as follows:

*Preferred Crop Tree:* the highest class; a tree with a dominant crown and no or minimal sweep or crook and no or few limbs in the butt 16' log.

*Acceptable Growing Stock:* a tree of codominant or greater crown class with moderate sweep or crook and a moderate number of limbs in the butt 16' log.

*Unacceptable Growing Stock:* Any tree not meeting the above criteria

**37. Question/Comment: Are old pines called "wolf trees"?**

Response: A wolf tree is a large, excessively branchy tree which occupies more space in the forest than surrounding trees. Wolf trees have high wildlife and aesthetic value.

**38. Question/Comment: Using the term "overmature" trees is poor terminology.**

Response: An overmature tree (or forest) is one that has aged more than 80% of its life expectancy and is tending toward senescence with or without reduced vigor, and declining gradually or rapidly but

irreversibly to death. The term refers to an age class of an individual tree or forest such as young, immature or mature.

39. Question/Comment: The term “clearcutting” needs to be clarified.

Response: As defined by the Society of American Foresters: clearcutting is “method of regenerating an even-aged stand in which a new age class develops in a fully-exposed microclimate after removal, in a single cutting, of all trees in the previous stand. Regeneration is from natural seeding, direct seeding, planted seedlings, and/or advance reproduction.”

Clearcutting is most often used with shade intolerant and intermediate tolerant species like aspens, birches, and oaks which require full or mostly full sunlight to reproduce and grow well. Sometimes clearcutting is used or to create specific habitat for certain wildlife species or to harvest a stand that has been decimated by an event such as a tornado or hurricane. Clearcutting produces an even-aged forest stand.

The current approved Forest Resource Management Plans state that “clearcutting (the removal of all trees in areas greater than 2 acres) is not a standard treatment . . . However, there are some circumstances under which clearcutting may be considered, including forests with widespread mortality from disease, insects, or windthrow, or snow and ice damage.”

40. Question/Comment: DCR is using misleading silvicultural terminology that are all other names for clearcutting

Response: Some harvesting operations not prescribed as a clearcut have resulted in a clearcut. For instance: In some harvesting of seed/shelterwood trees, prescribed as “overstory removal” in a shelterwood system, advanced reproduction (seedlings and saplings) were destroyed. In effect, all trees were removed.

41. Question/Comment: DCR maintains it is not doing any commercial harvesting so why are some planned projects called “commercial thinning”?

Response: DCR’s forest management goals are not driven by the need to maximize economic or commercial return from its forest land. Rather, goals and objectives for forest management are based on creating a diverse forest environment and enhancing ecosystem processes.

Commercial thinning refers only to the fact that the trees that are cut during a thinning operation have commercial value and are sold as timber products.

### **General topic – Plantation Harvests**

42. Question/Comment: Three comments supporting harvesting non-native spruce plantations and encouraging early successional habitat

Response: Thank you.

### **General topic – Silvicultural Practices Relevant to Posted Summaries**

43. Question/Comment: Individual selection is superior to any other method of harvesting

Response: Single tree or individual tree selection is an uneven age method of regenerating a forest. It is almost exclusively suited to reproducing very shade tolerant tree species such as sugar maple. It therefore, can not be considered superior to other harvest regeneration methods because it is applicable to certain forest types and species.

44. Question/Comment: The use of group selection erodes the term uneven aged management

Response: Group selection is also a well accepted, uneven age method of regenerating a forest. Because openings are slightly larger than are created in single tree selection, species of varying shade tolerance can be reproduced. It is particularly applicable in providing multiple age classes and diversity on a larger, landscape level.

### **General topic – Silvicultural Practices not Relevant to Posted Summaries**

#### **General topic – Miscellaneous**

45. Question/Comment: The 1-5-09 postings include 4 projects with clearcutting totaling 166 acres and should have additional information, site visits and public comment opportunities (2 comments)

Response: Our current postings include 186 acres of group selection (2 sales), 145 acres of shelterwood (2 sales), 9 acres of timber stand improvement (1 sale), 15 acres of seed tree (1 sale), 135 acres of a combination of shelterwood and thinning (2 sales), 80 acres of a combination of group selection and thinning (1 sale), 20 acres of thinning (1 sale) and 20 – 40 acres of home fuelwood (1 sale). Note that the approved district plans do not allow the annual cut levels to exceed the established ceilings established within them.

46. Question/Comment: Several projects call for the removal of native species, how does this fit with the goal of promoting greater native diversity

Response: The vast majority of our forest land is composed of native tree species. Using forest management tools such as harvesting and thinning does promote greater native diversity. These tools allow for multiple size and age classes to occur as well as a variety of species to flourish. Cutting native species to fulfill that mission is likely to occur.

47. Question/Comment: All of the home fuelwood postings should make a distinction between sales for individual and commercial use

Response: There is only one such posting during this comment period and the posting states: “It is expected that the homeowner will hand carry the wood from the forest to their vehicle and that these vehicles will be used to transport the wood from the road to their home.” The inference is that this is an individual sale, not commercial, but we can be more explicit in the future. Also, contract for removal of the fuelwood is explicit in prohibiting the commercial sale of the wood.

48. Question/Comment: Timber sales should be posted at least 6 months prior to the marking of trees near the site and in local media

Response: Timber sales are posted before the marking of trees but there is no minimum time frame. Trees are definitely not marked before the end of the comment period and sometimes not for a year or two and in some cases, never since not all of these proposed harvests get that far. It is not our current policy to advertise proposed sales in local media, only on our website and on-site with an informational poster, however we are open to considering ways to make this information more widely available

49. Question/Comment: Discussions of the sale should take place on site

Response: This is a good suggestion and it is now our policy to conduct on site visits for projects that we expect to generate a lot of public interest. We are also seriously considering site visits to all of our proposed projects.

50. Question/Comment: Public meetings should take place during the daytime on weekends and on site

Response: This is a suggestion that we will consider. We have taken strides to accommodate public interest in proposed projects holding public meetings twice a year, once during working hours (3 – 5 PM) and once in the evening (6 – 8 PM).

**51. Question/Comment: The public should be informed through email when timber sales are advertised and at the DCR website**

Response: Currently, it is our plan to periodically and systematically update the “status” of all proposed projects on the Proposed Harvesting Summaries website. The status will include a category of “offered”.

**52. Question/Comment: Supports DCRs efforts to provide greater transparency**

Response: Thank you.

**53. Question/Comment: All of the proposed timber harvests add up to 4,789 acres and this amount of harvesting is not justified**

Response: This total cited includes harvest summaries over a two and a half year time span (5 postings, each covering a six month time period) and these are only proposed harvests, not planned harvests. It only represents 1.7 % of the entire DCR-DSPR forest land base over that time period or about 0.7% of our forest land that is planned for timber management per year.

**54. Question/Comment: There were nine comments having to do with public notification**

Response: DCRs policy is to post Proposed Timber Harvest Summaries on our website. We currently do not post cutting plans although we are looking at ways to make this information more widely available. Any changes made to the proposed projects will be reposted. Any changes in timber harvesting policy determined by the Commissioner are posted on the BOF website at <http://www.mass.gov/dcr/stewardship/forestry/index.htm>

**55. Question/Comment: Reinstate the home fuelwood program as it is a wonderful program**

Response: We added one this past posting and will continue to encourage our foresters to do some of these each 6 month period.