

The Forest Futures Visioning Process Technical Steering Committee disseminated its Draft Recommendations to the public seeking feedback. The comment period closed on February 22, 2010. One opportunity to comment was through written mail submissions sent to the Massachusetts Office of Dispute Resolution & Public Collaboration. Contact information has been redacted due to complaints about unsolicited contact by some individuals. This document compiles letter comments, in the order received, **between February 6 and February 10, 2010.**

To whom it may concern.

A few questions and comments concerning wind turbines:

- 1) **Are our Berkshire ridge-lines suitable for industrial wind turbines?** Everyone seems to assume, because wind developers are targeting our ridge-lines, that these are viable places for industrial wind turbines. Let's look at that. Anyone who has lived in the Berkshires knows how fickle our winds blow. Mostly they blow in the winter months when the demand for electricity is lowest, and hardly at all in the hot summer months when the demand for electricity is highest. But beyond that, we must look at the science. Wind is rated by classes: Class 1 the lowest, class 7 the highest. Each class is a multiple of the previous class. That means the efficiency of wind from one class to another, laid out in a graph, is not a straight line but rather a steep curve, increasing sharply as you approach the higher classes. Mr. Quinlan, the wind scientist from the University of Massachusetts, hinted at this in his remarks at the Wind Energy Reform Act forum in Pittsfield, MA on October, 19th. "A little increase in wind makes a big difference." According to the Massachusetts Wind Resource map our Berkshire ridge-lines are generally rated from class 3 to class 4. In comparison, off-shore wind classes generally range from class 5 to class 7. With a barely marginal class 4 wind on our ridge-lines why are we considering a plan that is not wholly supported by science? Certainly, if we must use wind to generate electricity the logical thing is to put the turbines where there is wind. I understand the drawbacks of ocean sites but the increase in output is enormous. Do the math! (Other countries use ocean sites.)
- 2) **Is there a real need for more electrical generation?** The spin on the urgency to build more generating facilities is simply astonishing. It reminds me of a story when I was a child: Chicken Little, "The sky is falling, the sky is falling." The reality is some of the electricity now being generated in MA is not being used in MA. It is being piped to other states. And too, we waste a significant amount of the electricity we do generate, through poor transmission lines, inefficient lighting and home appliances, poor building structures and building codes, and lack of conservation. Shouldn't we focus more on these very real and solvable issues before we promote a feel-good solution that in actuality will enable these inefficiencies to continue? Doesn't it make sense to plug the holes before we add more generation? And, unlike wind turbines, wouldn't a dedicated plan to plug those holes create much needed long term jobs in the process?
- 3) **Is wind a good source of energy for commercial electricity?** Most people assume that commercial electricity is stored somewhere waiting to be used. Nothing could be further from the truth. It is the energy source that is stored, not the electricity. Therein lies the crux. Think about that. Wind energy cannot be stored, nor can commercial electricity. Now consider this; electricity is bid-on and sold 24 hours before it is needed. Generation and distribution must be produced on demand; otherwise there are blackouts, brownouts, and huge fines. Obviously, wind is not available on demand. It is unpredictable, intermittent, and unreliable...(and nowhere in Massachusetts more so than on our Berkshire ridges). And because of these drawbacks there must always be standby generation from other sources to compensate for interruptions and surges. These standby sources are usually selected from the most polluting because they are the cheapest. So, until there is a viable way to store the electricity wind turbines generate, wind is absolutely the most inefficient and inappropriate way to produce commercial electricity.
- 4) **How big are these things, and do we really know their effects on wildlife?** Studies of potential wind development onshore show up to 3386 industrial turbines throughout Massachusetts: 2474 on state land, 912 on private land. The turbines range from 380 feet to 500 feet from base to blade tip. Each single turbine location uses approximately 5 acres of land. And this has to be clear-cut and blasted of ledge to level for the base. Because of their height and location they must be lighted 24 hours a day, 365 days a year. Now for comparison, Greylock tower is 93 feet tall...and certain times of the year is unlighted because of potential migrating bird and bat mortality. We can only imagine the effects of not one, but scores of these

gigantic, whirling, flashing wind turbines, lined up along our Berkshire ridge-lines, attracting and destroying anything and everything that comes in their path. The picture is not pretty. To locate and service these huge turbines long and extremely wide roads must be built, often on steep slopes and across brooks holding the last specimens of native trout. Silting and erosion are very real problems.

- 5) **Can the wind industry be trusted?** The wind industry has tricked its way into the proponents hearts and minds with untruths. They proclaim their turbines will produce multi-megawatts of much needed electricity, enough to supply the needs of thousands of homes, reduce our dependence on foreign oil, and help clean up the environment. The spin sounds great, and it is tempting to buy into it. But the spin is not the truth. In fact, getting useful information from the wind developers, such as output at different wind classes, annual useable electricity produced, and subsidies and costs associated with that production is next to impossible. Economics and real numbers are rarely discussed. Wind turbines on our Berkshire Hills are not about protecting the environment, local or global...or about reducing our dependence on foreign oil...or even about electricity. It is all about money. Lots of money. With the hundreds of millions of dollars in grants, tax incentives, and saleable renewable energy certificates (RECs) this will be the greatest transfer of wealth from the taxpayers and rate-payers of Massachusetts to the pockets of foreign developers in the history of this Commonwealth.
- 6) **Is the trade-off to our quality of life worth it?** Wind turbines on our Berkshire Hills will take up huge tracts of pristine land for very little energy produced. "Keep Out" signs will be posted, many of them prohibiting us from our beloved hiking trails and wildlife viewing areas. We will face flickering strobe lights, and the whoosh, whoosh of revolving blades, day and night. All told, they will destroy our scenic views, despoil what defines our Berkshires as beautiful, diminish our quality of life, endanger the ecosystems of our most sensitive areas, kill migrating birds and bats, reduce property values, enable existing polluters to continue polluting, and distract from real solutions to our energy problems.
- 7) **Is there a better way?** With increased efficiency and reduced costs of solar energy on the horizon, new energy science in fuel cells, more awareness and conformity of conservation techniques, and green building mandates for all new structures, wind generated electricity will soon be reduced to just another big bad idea. Let's hope sooner than later.
- 8) **Closing thoughts:** Before we leave a legacy of needless environmental ruination primarily for the gain of developer's dollars let's protect now what is priceless. What we need is an independent science initiative to determine best practices for energy conservation, energy efficiency, and realistic alternative energy sources. We need wisdom and patience, and not feel-good solutions influenced by "Chicken Little, and the sky is falling".

Respectfully yours,

John R. Trimarchi

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GREEN DIAMOND SYSTEMS

February 6, 2010

To Whom It May Concern:

RE: MA FOREST AND CLIMATIC REALITIES

I am concerned that in all of the discussion of forest visioning and forest stewardship there has been little consideration of the resource or climatic realities. At the Pittsfield gathering on Feb. 6, 2010 I had a chance to ask Dr. Moomaw a few questions regarding the status of our climate and he echoed my concern. My question was: 'In view of the recent uptick in Arctic methane release is it possible that the predicted 7% per annum observed methane release by coastal shelf deposits of methane ice and decomposition of organic matter now stored as frozen permafrost will soon eclipse and surpass the effects of CO2?' His answer was that this would quite likely be the case.

Nowhere in the recommendations of the TSC do I find any mention of this problem. While it may seem that this is beyond the mandate of the TSC, our forest health seems to be an overarching concern and there is not way to disconnect forest health and the current resource consumption and depletion and the resulting pollution by our global society. Nor is there any connection (other than a brief mention of carbon sequestration in 'healthy' forests) between forests or forest management or forest product use with employment of local people in MA forests. Such forest employment if appropriately funded and supervised could help minimize the effects of the unsustainable demands that those unconnected with actual forest maintenance now make on the non-renewable resource base of all regions.

Aside from Dr. Moomaw, I did not find that the TSC personnel were particularly well equipped to propose proactive measures, and therefore it is not surprising that the message that Dr. Moomaw brought to the table was 1) not able to be heard, and 2) because it was so threatening was not able to be included into a statement meant to be a political band-aid for the current administration.

The TSC recommendations are so far from the current realities that it is not possible to make suggestions without rewriting most of the text. However, some preliminary comments to the TSC Recommendations are appended below. These comments require responses that are completely beyond the mandate of this group and propose radical restructuring of our financial control system. However, that is exactly what is needed. So the TSC could be a vehicle for further proactive steps years hence.

Any discussion of forest health must present as part of the text an exact description of what is meant! It must include the time frame over which this quality is to be measured and how to make such measurements. Forest health must be related to climatic stability because the structure of any forest will not protect the ecosystem from collapse given enough change. Therefore, an expected trajectory and timeline for climatic change needs to be part of the background statement on forest health.

The discussion of adaptive management was interesting but completely unintelligible since there are no in state experimental and demonstration sites that are distributed and described for public review. Any 'adaptation' must have a base from which to adapt and suggestions of what the adaptation expects to accomplish.

Sincerely,

Alan C. Page, Ph.D.
MA Licensed Forester #184

• BELCHERTOWN, MA • 01007 •

Modified Comments Submitted to the TSC Survey about the Forest Stewardship Recommendations:

Overall: (the first question of the Survey)

Our society is on a collision course with resource shortages of many different kinds among them are going to be local energy and structural materials as well as a period of climatic instability or disaster. This 'Forest Vision' is basically a fantasy - constructed in a vacuum of steady state climatic conditions and a stable resource base. As a research forester the outcomes from effective management are far from fully documented as are the implications of financial decisions based on the fraudulent currency creation system that functions (dysfunctions) in the USA today. This economically flawed system that taxes things that support life while letting large polluting systems grow and prosper are not addressed anywhere in the TSC Recommendations.

These same views of reality have produced the economically appropriate but operationally and silviculturally flawed CH 132 and 131 regulations that allow temporary use of the most egregious forms of harvesting while denying owners the opportunity to have access to isolated portions of their property due to wetlands impediments and thus are unable to remove small volume energy crops or do management in the absence of heavy equipment and temporary crossings. This is far from a sustainable situation.

The approach of 'protection of place' as the major mode of preservation of a variety of ecosystem services is OBSOLETE. This form of protection is patently INEFFECTIVE in this new arena of resource shortages and climatic instability. There will be no protection offered when the greenhouse gas effects of methane eclipse the current mix of ghgs.

(The paragraphs below are numbered to correspond to the numbers of the TSC Recommendations:)

1. Again the association of protection of place with ecosystem services is erroneous. Proactive measures are needed to avert catastrophe. These recommendations are political cover nothing else.
2. Protection of forests will require things like limiting population growth, reducing truck traffic for all but local delivery, increased local production of all goods and services, increased use of renewable and reusable "everything", increased rail traffic, decreased reliance on military coercion of others to supply resources, massive reduction of per-capita energy use, to name a few. Forests will be dead as the temperatures trend toward the GA level predicted for 2070 by a MADAR consultant presented in a April, 2008 Agriculture Commission Seminar.
3. Private lands are private and should remain that way until the State sees fit to pay for the services that must be supplied and can only come from certain private holdings, until then the investment and taxes do and must isolate that land from public control! The CH132 and 131 controls are already inappropriate and overburdening land that has been dedicated to renewable resource production. Especially for those lands now under Chapter 61 & 61A there needs to be significant facilitation of proactive management. The tax incentives while helpful are no where near adequate to the task of facilitation of the next generation's assumption of the roles of future forest management.
- 4.—no comment

5. There are many issues that are going to affect forests as things change. I have nothing against preserves but I believe that none of the above mentioned required ameliorative actions will be forth coming and that the damage from these venues will be unstoppable and the death of these reserves will become a major source of either positive reinforcement of climate change or contamination of surrounding areas with invasive insects and diseases.

6. The users of parklands do not understand what is happening to these areas. There are no signs explaining how the current 'hands off' treatment is affecting the forest and what this condition is likely to evolve into. This is a very big problem because of the lack of biological literacy of the general public and the lack of trust of 'caretaker' regimes. The refusal to allow proactive measures is a symptom of this distrust which must be dispelled. This can only happen with an extensive program of signage and effective predictive documentation – followed by enough time to provide a context for confidence in the ability of the management teams.

There have been several DCR recreational areas where the stands of trees grew into an unsafe condition for public exposure because nothing was done. When steps were taken to address this condition with no prior notice (5-10 years may be needed along with patience to let some areas fall apart while the documentation can point to these unfortunate areas), it is quite understandable that a firestorm of unhappy users can develop. This problem can be expected to increase in occurrence and severity as changes occur both within the natural stand structure and the overarching climate.

7. This recommendation throws manager competence to the wind and sets out standards that will be shown to be inappropriate and certainly far from the best that can possibly be done. Indeed, as resource scarcity becomes the norm these areas may be overrun by people looking for firewood or they may be able to offer sources of local employment that will be impossible given the recommended stand structure. It is one thing to require this in parks it is quite another to dictate management practices when there is as much change likely to occur as is apparent now.

8. This is the most open and appropriate statement of the group, however, a key component has been left out of the suggestions. That is to provide a systematic basis for understanding how one should adapt if the need arises. To this end we need both a rigorous system of forest management experimentation and demonstration through out the state so that both managers and the public can understand the options that one would adapt toward. There is nothing suggesting how this kind of thing could be paid for so that will be added here. A Strategic Public Forest Bank should be created for the specific purpose of facilitating all appropriate forest growing and product processing functions. This bank should be structured to either use a local currency to limit the external use of this funding source outside of the state or it should be able to recognize the ecosystem services (carbon sequestration in the form of biochar - rather than standing trees, nutrient retention, water purification, storm water runoff control, scenic aesthetics, wildlife habitat, and compensation of local labor for maintenance of forest productivity and health). The importance of forest stewardship will require a very different relationship with the forest than is now common. So in return for the support from this local strategic bank those receiving the largess from the excellent forests should be willing to forgo supernormal salary compensation by either investing amounts more than 3-5x the regional poverty level back in their forest or return it to the public general fund with an 80% tax above the 3-5x poverty level. The goal is to recognize that forest production is such a long term process that all invested funds will not make a return in a normal professional life span with the technologies we now

have. Of course experimentation and innovation may make this statement obsolete as well. Above all this strategic bank should not be a source of funds for gambling on other industries or currencies.

9. Hopefully this is a step toward building a better level of public understanding of forest dynamics. However, the process as I have observed so far is more a politically-correct process than an information sharing process. Local forest treatment demonstration areas are an essential part of the development of public understanding. It is expected that people will come to these areas to enjoy themselves but also to learn about various techniques as these techniques and the forests they are applied to develop over time. This will not be cheap but it is possible with a 'public strategic forest bank' to create the funds to do the work to allow the educational process to happen over time. There is no need for the funds of this bank to be part of the State budget since it can create currency in a non-inflationary manner for the common good. The management of the forest bank would have specific regulations and goals and the local economy would thrive with the insights gained from open study and communication.

10. See the above 2 discussions of public strategic banking. Particularly refer to the Bank of ND website for a 90 year history of this state bank that was formed to protect the state of North Dakota from the thieves of the 1917 era.

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Dear Members of the Technical Steering Committee,

I am a resident of Massachusetts and I would like to share my views regarding the use of DCR lands. I am unable to attend the public forums but would like to share my opinion.

I believe in the wise stewardship of state lands. I think timber harvesting should be allowed for the following reasons:

1. It promotes growth of young trees; it provides food for song birds and wildlife.
2. It provides jobs: total Massachusetts employment including forestry, wood products and the pulp and paper industries is 16,801.
3. Timber management on state lands protects our water and provides trails for public safety including fire and rescue equipment.
4. Residents benefit from lower taxes as revenue is generated. The amount of growth of timber on DCR lands far exceeds what could be harvested.
5. I believe landowners and timber harvesters should be allowed to continue to file forest harvest plans as they have for years.

We all enjoy our forests in Massachusetts. Wise use of DCR lands (308,000 acres) should include proper timber harvest with accountability. State land forestry practices should be a model for the private sector.

Thank you for your consideration.

Sincerely,

Mieko Ohshima

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Comments on DCR's Forest Visioning Process and Technical Steering Committee Recommendations

Lincoln Fish
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Thank you for the opportunity to comment on the "Forest Visioning" TSC report. While the TSC report reflects a great deal of effort and the compilation of a large amount of information, there are some very serious flaws contained within, largely as a result of its real purpose and its organization.

From my perspective, the most serious flaw is the lack of involvement of a broad cross section of the public. The visioning organizers seem to have a narrow definition of the term "stakeholders" that includes only two categories: wood products industry and environmentalists. No representation from small town select boards, which stand to lose an important source of revenue if DCR lands in their town are locked up in reserves. Many small towns in western Mass have too small a tax base because so much of their acreage is taken up by DCR land. A DCR harvest with a percentage of the revenue going to the town in which it was carried out can mean the difference in keeping that part time art teacher employed or keeping the roads sanded. Was the Massachusetts Municipal Association contacted? DCR seems ready to give away the farm and these real Stakeholders were not at the negotiating table.

Another flaw is the lack of any reference to the volume of wood products consumed by the Massachusetts population. How can one speak of restricting harvesting without any thought to forest products consumption? It is illogical to consider one without the other. (See the *Illusion of Preservation*, Berlik, Kittredge and Foster, Harvard Forest, 2002 which contains data indicating that Massachusetts production of wood products amounts to less than 3% of our consumption). Environmental responsibility would dictate that creation of forest reserves should be tied to either reducing consumption or increasing production on other lands, and hopefully both. To do less is tantamount to saying to the world that we think it is fine to continue to clear the Amazon to satisfy our appetite for forest products. Hasn't the world seen just about enough of that kind of arrogance and elitism out of North America lately?

Both of these flaws are not surprising considering that the real motivation for the "Visioning Process" was not to involve a cross-section of the public in a new vision for

DCR forests nor was it to develop more thrifty methods for using our public forests to maximize global environmental benefits. Rather, the motivation for “Visioning” appears to have been the appeasement of a few vocal anti-harvesting activists that had embarrassed the leadership of DCR and EOEEA in recent years. Until the real motivation for such a visioning process is the long-term good of our public forests and society rather than a short-term political goal, the results of such an exercise will likely continue to be flawed.

Below are my responses to specific recommendations of the TSC:

Recommendation 1:

Adopting an ecosystem services model is a good thing. It reflects what I witness is already the case in the practical day-to-day management of all public land in Massachusetts. Managers already look far beyond the production of forest products and consider diversity, water quality, soil conservation and recreation/aesthetics. It is important for us to not pretend that this is something new for state lands. It is simply formally naming that which already takes place.

There is an odd use of words in this section that should not pass unnoticed. It seems that in Vision-Speak “ecosystem services” is a term used for things that happen only in forests without harvesting. Yet every example listed: biodiversity protection, clean water, carbon sequestration, soil formation and nutrient cycling, and recreation are forest processes that happen just as well and often better in a carefully managed forest.

One troubling sentence in this section reduces management of the DCR acreage designated as woodland to “demonstrations of how forests can be managed”. While demonstrations of forest practices are commendable, I don’t see why we can’t bring ourselves to say that the actual *production* of forest products is a noble goal that we should pursue. Yet we all use forest products. We should be proud to produce them on DCR lands and do it well.

Recommendation 2: Commissioner of Forest Stewardship

We have long needed somebody in a position of authority over forestry on state lands that would have enough interest to promote good forestry and defend forestry when it is unjustly attacked. DCR, being primarily a parks agency, seems to be unable or unwilling to fill this role. Consequently, it seems like a good idea to either move forestry to another agency, create space for it under a separate commissioner or change the way DCR administers forestry programs.

Recommendation 3: Private lands

The TSC seems to be suffering from MISSION CREEP. The mission defined for the TSC and ASG was to look at DCR Forests and Park Lands. Individuals were chosen for participation based on that understanding. Many representative groups who would have a compelling interest in private lands were not included in this specific DCR mission. Consequently, I recommend striking all recommendations for private lands from this DCR Forest and Park Lands document.

Recommendation 4: Three landscape zones for DCR lands

This seems to be a sensible proposal. It would hopefully streamline management decision-making and planning. The key questions are of course, how much and where? I would hope that answering these questions would involve town officials who have not been part of the visioning process thus far (see paragraph #2 above). Also, I would hope that long-term land use decisions would be made based on Massachusetts-specific species needs, not on an arbitrary need to get a certain percentage of land in any specific category. For instance, if a brushy abandoned pasture is in an area designated as a reserve, biodiversity will be decreased by such a designation. I would like to see the allocation of acreage ranges in the three zones by the TSC subject to further scrutiny by wildlife biologists.

Recommendation 7: Management of Woodlands

I think there is a danger to locking in rigid management practices based on today's changeable politically correct standards. Forestry is a young science (only 100 years old) and research is being done on important issues. For instance, much research is needed on whether removal of whole trees can be done in partial thinnings without depleting the soil. I don't believe that anyone can definitively answer this question at the present time. It would be foolhardy to prohibit whole tree harvesting forever on DCR lands when some new research might give us important data on this question in the next few years. Perhaps managing conservatively now without whole tree harvesting until more information is available would be a reasonable approach. Likewise, some flexibility in patch size, allowable cut/growth ratio and early successional habitat size would be appreciated by future managers who would be then be in position to adapt to new science or to changing biodiversity needs. Prohibiting harvested wood that meets all silvicultural standards from being used as biomass makes little sense and sounds like something said to placate anti-harvesting activists.

Overly rigid management standards based on today's standards indicate that we don't trust managers of the future to do what is best for the land and for society. I think that is the wrong message to send. If there is truly a problem with management of public forestland, DCR should instead: 1) hire adequate staff and not allow key positions (such as Chief Forester) to go unfilled, and 2) make sure that sound policies, communication and chain of command are in place and working, and 3) have in place personnel that can defend forest managers when they are unfairly accused of poor forestry practices or allow them to defend themselves. If creating conditions for a viable forest management program means moving to another agency, so be it.