

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 email submissions to an email address established for the process by the Massachusetts Office of Dispute Resolution & Public Collaboration. Email and contact information has been redacted due to complaints about unsolicited email contact by some individuals. This document compiles **Part 2** of the email comments, in the order received, **on February 19, 2010**.

From: Delaney-English, Julie [REDACTED]

Sent: Fri 2/19/2010 1:38 PM

To: MA Office Disp Resolution

Cc: [REDACTED]

Subject:

Attachments:  DFW Comments on FFVP Recommendations (2).pdf(894KB)

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Attached are comments submitted on behalf of the Massachusetts Division of Fisheries and Wildlife relative to the Department of Conservation's *Forest Futures Visioning Process Draft Recommendations*.

Julie Delaney-English

Julie Delaney-English
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[REDACTED]



Commonwealth of Massachusetts

Division of Fisheries & Wildlife

MassWildlife

Wayne F. MacCallum, *Director*

The DCR Forest Futures Visioning Process Draft Recommendations contain a number of proposals that reflect time and effort on the part of participants in this process, and the Division of Fisheries and Wildlife (DFW) is appreciative of these efforts. DFW believes that the recommendations could be improved by strengthening documentation and requiring a scientific basis for some recommendations, and avoiding going beyond its original scope of this review, thereby reducing considerable public confusion. Furthermore, DFW believes that these proposed actions will have unintended negative consequences on the biota of Massachusetts' forests.

Principally, these actions:

- Fail to adequately support biodiversity in the Commonwealth particularly in stemming the decline of wildlife species and associated habitats such as young forest, shrublands, or grasslands.
- Diminish the ability to regenerate declining oak forests.
- Constrain the ability to respond and adapt to impacts from climate change and invasive species.

Summary:

Recommendation 2 and related statements characterizing the management of forests as requiring greater coordination across agencies fails to consider the existing statutory requirement for interagency coordination on forest management under MGL Ch 21 par 2F. It would seem that implementation of this mechanism should precede any new statutes or reorganization.

Recommendation 4 provides no justification or science base for the recommended percentages for forest reserves, parklands, or woodlands and provides no measure as to the effectiveness of these sizes in providing the desired ecosystem services. The Report makes scant reference to the abundant scientific research supporting the need for a greater representation of younger forest age classes on the landscape to address on-going habitat decline for some 21 vertebrate species, yet concludes that 'the need for and approaches to creating early-successional habitat remain unresolved'. The report does not state how this determination was made, nor does it state who does and does not support such a determination. As stated, the recommended percentages of forest age classes result in a distribution that is deficient in younger age classes needed to stem on-going species declines.

Additional Forest Reserves. The recommendations for additional forest reserves are not accompanied by any scientific justification. The process for establishing the existing reserves was an interagency effort using a rigorous science-based process. In recommending additional criteria for reserve selection this standard is not met. In the absence of a sound basis for this recommendation it is difficult to see what needs are now unmet or to understand why a specific numerical goal makes sense. Finally, the FFVP document does not explain how active forest management is incompatible with numerous proposed additional reserve criteria.

www.masswildlife.org

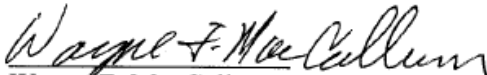
Division of Fisheries and Wildlife
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An Agency of the Department of Fish and Game

Recommendation 5 calls for legislation to establish the location and amount of reserves rather than use adaptive management as conditions warrant. This will seriously impair the ability of the state to respond to climate change and invasive species in a timely and effective manner. Science-based adaptive management requires flexibility in applying various management options as conditions warrant. The Report does not explain the rationale behind the severe limitations proposed for hunting, fishing and trapping now enjoyed by the public on DCR lands. No explanation is offered for such restrictions nor are their benefits identified.

Recommendation 7 presents a false dichotomy between uneven aged vs. even-aged silviculture. The Report suggests that even-aged silviculture is widely practiced and that a shift is needed toward uneven-age management, yet both systems are infrequently encountered in Massachusetts. An emphasis on uneven-aged management is not only unsubstantiated, but has negative implications on supporting early-successional wildlife habitat and the regeneration of oak forests. DFW recommends that DCR focus on the desired future condition of DCR state forest and park lands, and employ the most useful silvicultural practices to achieve that support those conditions and ecosystem services.

DFW looks forward to DCR's consideration of these comments in establishing the final recommendations of the Forest Futures Visioning Process.

Sincerely,


Wayne F. MacCallum
Director

Recommendation 1: Adoption of an Ecosystem Services Model to Guide Forest Protection and Management

DFW is responsible for the conservation - including restoration, protection and management - of fish and wildlife resources and state-listed flora and fauna for the benefit and enjoyment of the public. The perpetuation of biological diversity is central to achieving this mission and requires that DFW works to balance the needs of people and wildlife today so that wildlife will be available for everyone's enjoyment today and for future generations.

The ecosystem services model is based on the framework outlined in the Millennium Ecosystem Assessment (2005) in which biodiversity maintenance is considered a "support service" essential to the provisioning of wildlife resources for human enjoyment and benefit.

Based on this framework, the DCR's FFVP document recommends that "primary management goals for DCR lands...must include biodiversity protection (including both early and late successional species) as well as clean water, carbon sequestration, soil formation and nutrient cycling, and public recreation including wilderness/old growth/spiritual experiences, ...and demonstrations of how forests can be managed to provide sustainably grown wood products."

DFW's mission is therefore aligned with the ecosystem services model proposed for adoption as the DCR's guiding management paradigm. Ecosystem services are often linked and deer management on Quabbin Reservoir lands is an excellent example of this where the provision of hunting opportunities has maintained deer densities at levels which support the conservation of biological diversity, forest regeneration, water quality, and public safety.

Recommendation 2: Elevated Role for Massachusetts Forests in Commonwealth Environmental Decision-making Processes

Elevating the role for Massachusetts forests in Commonwealth environmental decision-making process strengthens the ability to protect and conserve forested landscapes which are critical to sustaining biological diversity within the Commonwealth. However, there are a few items proposed in the FFVP document which are unclear and should explicitly be addressed in the final document.

First, it is unclear how or whether DCR intended to include DFW lands as part of the broad terms "...the Commonwealth's public forests" and "...all public lands" which are used repeatedly throughout the document. DFW reminds DCR that DFW lands are under the authority of the Fisheries and Wildlife Board and that any recommendations, policies, or regulations relating to the management or control of DFW lands would require the Board's consideration and approval. Furthermore, any recommendations relating to DFW lands must be compatible with the primary authorized purposes for which those lands were purchased.

It is also not clear in the FFVP proposal for a Commissioner of Forest Stewardship how their responsibility to "...oversee the management of publicly owned forestlands across the Commonwealth" would relate to DFW lands. This is especially unclear given the role of the Director within the Division of Fisheries and Wildlife under statute M.G.L.

Chapter 21, §2F: which states that:

"The directors of the divisions of state parks and recreation and urban parks and recreation shall work in cooperation with the director of the division of fisheries and wildlife within the department of fish and game to establish coordinated management guidelines for sustainable forestry practices on public forest lands within the departments of conservation and recreation and on private forest lands. Said guidelines for public forest lands shall include agreements on equipment, personnel transfers, operational costs, and assignment of specific management responsibilities."

DFW fully integrates wildlife, fisheries, and natural heritage and endangered species within its forestry program – providing a model for the Commonwealth of Massachusetts in maintaining and enhancing biodiversity.

A separate concern of DFW is the FFVP document's vague statement that: "Currently, forest stewardship decisions are spread across several state agencies and are often decided in a manner that does not adequately support and encourage forest protection and stewardship to compete for the state's limited environmental resources and dollars. Relegating the responsibility of forests to agencies with other primary purposes has resulted in a lack of knowledgeable and effective leadership, often leading to poor accountability across the existing bureaucratic structure". It is unclear from this statement as to which of "several state agencies" the FFVP document has identified.

The 'Discussion' on pg. 27 relative to Recommendation 2 states that "...planning activities for all state owned forestland, particularly those related to recreational uses, must be carefully integrated and coordinated." In this regard, DFW recommends to DCR the provision of hunting, fishing, and trapping opportunities as valuable recreational uses on DCR state land.

In general, DCR should be clear that the FFVP recommendations relate to DCR Forest and Parklands only, consistent with the scope of FFVP goals.

Recommendation 3: Policies for Privately Owned Forests in the Commonwealth

DFW supports the conservation and protection of the public values provided by private forests in Massachusetts, especially as they relate to sustaining biological diversity and the provision of opportunities for public access, use, and enjoyment of wildlife and fisheries resources. DFW supports items outlined in the FFVP, specifically the promulgation of revised regulations under M.G.L. ch.132, the development and application of GIS data, incentives which promote private forest land conservation, and

improved public / private partnerships which advance the conservation of forests and associated biodiversity,

Recommendation 4: New DCR Landscape Planning Model

DFW has publicly supported management for both late-successional and early-successional forest conditions to provide various ecological conditions and public benefits for more than a decade. The FFVP document recommends designating three zones for DCR forest lands each with a certain management emphasis, yet it is unclear as to the justification for the following allocations:

Forest Reserves	20% – 38% (no commercial timber harvest)
Parklands	23% - 29% (no commercial timber harvest)
Woodlands	32% - 49% (commercial timber harvest allowed except for Level 1 Woodlands within which commercial harvesting is specifically prohibited.)

(50%-67% of Woodlands would be managed for late-successional forest attributes, 25% - 30% as early-successional habitat, and 13% - 20% for watershed purposes).

The consequence of this allocation is that about 90% or 277,000 acres of DCR forest lands would be either set aside or managed for late-successional forest and 10% or 30,000 acres for early-successional forest. This allocation would contribute almost 10% of all late-successional forest statewide, but only 1% of early-successional forest statewide over a 100-year rotation. If implemented, this allocation would fail to adequately support some wildlife species and associated early-successional habitat rather than stem their decline.

In contrast, DFW landscape composition goals call for a complete range of forest successional stages, including 15-20% early-seral (including both seedling and sapling-pole stages generally <30 years old) and 10-15% late-seral forest (generally >150 years old). Early-seral forest is needed to sustain habitats for vertebrate wildlife species experiencing long-term population declines, and late-seral forest is needed to provide structurally diverse habitats with old trees and coarse woody debris to support a diversity of invertebrate wildlife species and unique communities of forest herbs, mosses and lichens.

From the perspective of DFW landscape composition goals, the FFVP allocation of 90% of DCR land set aside as reserves or managed as late-successional forest could contribute almost all of the necessary late-successional forest in the Commonwealth, but only a small contribution towards early-successional or young forest. On which land would the remaining early-successional forest be provided?

On pg. 24 of the FFVP document, it states that valuable ecosystem services like habitat which promotes biological diversity “have little or no market value, and are therefore

unlikely to be supplied in sufficient quantities from private forests.” Given the economic reality of this statement, it is therefore even more critical that early-successional forest be provided from public forests.

Support for this reality was also described in DFW’s Comprehensive Wildlife Conservation Strategy (2006), also known as the State Wildlife Action Plan, by the following statement:

“Many private landowners report aesthetic concerns about even-aged cutting practices (especially clearcutting) that provide young forest habitat. In addition to aesthetic concerns, diverse landowner objectives, declining average size of land holdings, and frequent turnover of private forestlands present major challenges to managing forest habitats to benefit wildlife (Brooks and Birch 1988). As a result, the availability of young forest habitat continues to decline in Massachusetts.”

In fact, according to a study of private forest parcels and ownerships based on 2005 data, Dr. Kittredge at the University of Massachusetts and his colleagues found that the median parcel sizes for eastern, central, and western Massachusetts were 4.71, 7.28, and 8.09 acres, respectively (Kittredge et al. 2008). Given that a 5-acre minimum opening size is desirable for the more area-dependent early-successional wildlife species, only private forest landowners with at least 20-25 acres can provide a continuous source of habitat for early-successional wildlife species on 15-20% of their land at any one time. Based on Dr. Kittredge’s study, private forestland holdings of greater than 20 acres likely represent less than 25% of private forest land in the state.

DCR should address what incentives exist or can be created to encourage private landowners to create early-successional habitat to sustain viable native wildlife populations which depend on these declining habitats, especially in light of their recommendations for 90% of DCR forest lands set aside or managed for late-successional forest.

DFW’s Comprehensive Wildlife Conservation Strategy identified 21 species of greatest conservation need (SGCN) associated with early-successional or young forest habitat. The plan, which is referenced in the FFVP document, supports management for both early- and late-successional forest conditions. However, the FFVP document states that “...the need for and approaches to creating early successional habitat...remain unresolved...”, yet it includes three references for this statement, all of which support active management of early-successional habitats. The document also calls for “...additional public input both on the value of early successional habitat and the underlying science.”

DFW challenges the notion that the need for and approaches to creating early-successional habitat remain unresolved given a wealth of peer-reviewed scientific references which support early-successional management. DFW recommends that DCR take a closer review and consideration of the substantial evidence, documentation, and management approaches contained within the Comprehensive Wildlife Conservation

Strategy for conserving habitats and species of greatest conservation need which received broad public support.

Forest Reserves

The FFVP document on pg. 33 calls for substantially more forest reserves on state lands, and calls on the DCR Commissioner to appoint a committee "...to review and recommend the final layout of the forest reserve system". This has already been completed for DFW lands. DFW reserves were reviewed and unanimously endorsed at the Fisheries and Wildlife Board meeting on June 27, 2006. The FFVP recommendation should clearly be limited to DCR Forest and Park lands.

However, the FFVP document states on line 3692 that "the current Commonwealth of Massachusetts Reserve system is a step in the right direction. However, the system falls far short of what is needed. One of the major problems is that the criteria used by the committee to rank and select potential Reserves were incomplete."

DFW questions how the current reserve system "falls far short of what is needed", and how the determination was made. Also, the FFVP document does not explain the scientific basis for additional reserve criteria needed. Finally, the FFVP document does not explain how active forest management is incompatible with the following proposed additional reserve criteria starting on line 3707:

"Proposed Additional Reserve Criteria

The Reserves Working Group revisited the process and added the following criteria:

- Large blocks of contiguous forest, which should be ranked highest because the integrity and value of natural areas increases significantly with size;
- Opportunities for connectivity for plant and animal movement between large core Reserve blocks;
- Existing and potential connectivity with protected areas in adjacent states;
- Potential for expansion through private land acquisition or by other conservation partners such as land trusts or municipalities;
- Substantial representation within each ecoregion;
- Redundancy, geographically dispersed Reserves to distribute risk;
- Anticipation of future impacts of climate change on existing ecosystems;
- Contribution to carbon sequestration and mitigation of climate change."

Recommendation 5: Management Approaches for Forest Reserves

DFW questions the wisdom in legislatively establishing the location and amount of reserves where active management is restricted or prohibited especially in the context of sustaining biodiversity and adaptation to climate change. Science-based adaptive management requires flexibility in applying various management options as conditions warrant.

For example, the FFVP document proposes reserves in state forest areas of the southwestern Berkshires which have had recent records of New England Cottontail

occurrences, a candidate for listing under the Federal Endangered Species Act. Sustaining New England Cottontail populations which benefit from active management for young forest with high stem densities will be severely limited under a fixed reserve status and prohibition of active management. The Rangewide New England Cottontail Initiative, involving six states including Massachusetts, has identified key areas for habitat restoration on DCR state forests as part of an effort to restore 1,200 acres rangewide.

The FFVP document states that “some situations may call for ecological restoration and vegetation management in reserves,” but does not explicitly include management to sustain viable populations of native species. This strategy ignores the provision of ecosystem services for the full suite of native species. DFW recommends that active management for these purposes be included in DCR’s final recommendations.

DFW supports DCR’s recommendation for allowing activities such as hunting, fishing, and bird watching on Reserves, but questions as to why trapping was not also specifically stated as an allowable activity.

DFW is opposed to the loss of hunting and fishing opportunities as proposed in the FFVP consistent with the presumption of openness in the Open Space Bond Bill. The FFVP document (pg. 42.) proposes ‘Wilderness Areas’ which calls for no dogs, bow hunting and catch-and-release fishing only. However, the document fails to explain why such restrictions are necessary or the losses in public benefits resulting from such restrictions. It is not clear why regulated hunting, fishing, or trapping is incompatible, especially given the examples of wilderness areas within the extensive National Park System which allow hunting and firearms discharge as compatible uses. DCR should recognize the benefits from wildlife management which support many other ecosystem services and the costs associated with the absence of wildlife management options from restricted or prohibited hunting opportunities. Recommendations without basis disenfranchise those who have supported land acquisition for conservation and protection of open space.

Recommendation 6: Management Approaches for Parklands

As mandated under M.G.L. Ch. 21a, §2, ¶(3), DFW recommends that DCR develop and provide for wildlife-dependent recreational opportunities.

Recommendation 7: Management Approaches for Woodlands

A three-level system is proposed, of which Level 1 sets aside additional reserve lands within designated managed Woodland areas, Level 2 calls for uneven-aged management with a 1/3 acre limit on group selection size (which is insufficient for adequate regeneration of oak species and maintenance of oak-dominated forests), and Level 3 is a mix of uneven-aged and even-aged management with up to 5 acre openings allowed, although it is difficult to determine the annual allowable acreage of larger openings.

A false dichotomy is presented by the FFVP document relative to even-aged vs. uneven-aged management. Specifically, the document calls for "...a shift away from even-aged management – except for purposes of ecological restoration and creating early successional habitat – and towards a silvicultural philosophy based on uneven-aged selection methods that can provide a broader range of woodland ecosystem service values."

The FFVP places an unsubstantiated emphasis on uneven-aged management "...designed to promote complex, resilient forests that support the full breadth of biodiversity and natural processes, and maximize the contribution of our forests to climate change mitigation and adaptation". DFW primarily uses a hybrid between even-aged and uneven-aged management (perhaps appropriately called 'two-aged' or 'multiple-age management') that is, in fact, designed to promote complex, resilient forests that support the full breadth of biodiversity and natural processes, and maximize the contribution of our forests to climate change mitigation and adaptation

It has been DFW's observation that very little true even-aged or uneven-aged silviculture is practiced across the nearly three million acres of Massachusetts forestlands. The reality is that most public and private forest regeneration cutting practices are a hybrid between classic even-aged and uneven-aged silvicultural methods. DFW is no exception, as most of the regeneration cutting on state wildlife lands results in structurally complex two-aged stands where 80-90% of the treatment area is in a young, seedling forest stage following cutting, while 10-20% of the treatment area remains in 70-90+ year old forest (aspen regeneration on DFW lands is an exception to this two-aged approach in that <10% of overstory trees are retained to secure full sunlight to stimulate desired root suckering of clonal aspen trees). Therefore, it is unclear to DFW where there is a perceived need to 'shift away from even-aged management'. DFW recommends that DCR focus on the desired future condition of DCR state forest and park lands, and employ the most useful silvicultural practices to achieve that condition.

In DFW's Comprehensive Wildlife Conservation Strategy document, the decline of oak regeneration as related to forest cutting practices is noted in the following text:

"Forest cutting practices in Massachusetts typically involve partial overstory removal that is generally not favorable to regeneration of oak genera. Forest harvest operations in Massachusetts commonly remove about one-third (2.1-2.2 mbf per acre (DCR 2005)) of the approximately 6.2 total mbf per acre (Alerich 2000), and thus do not open the forest canopy adequately to secure oak regeneration. In much of the northeastern U.S., oak is not regenerating successfully on mesic sites amenable to growing oak, and is gradually being replaced by more shade-tolerant tree species such as red maple and black birch (Lorimer 1993, Healy et al. 1997). This trend is evident in Massachusetts, where the total area dominated by oak forest declined from about 35% to about 28% between 1985 and 1998 (Alerich 2000)."

Relative to Level 3 areas where even-aged management is allowed, it is not clear what science basis was used to recommend that no openings larger than 5 acres should be

allowed for early-successional habitat management. This would disallow management on DCR lands like the 35.5 acre aspen regeneration project on the Fox Den WMA that created such excellent grouse, woodcock, and other early-successional species habitat. In the second paragraph on pg. 49 the FFVP document notes that DCR has previously proposed harvesting only 25% of woodland growth, but under DCR's FFVP recommendations, that 25% harvest would be restricted to 1/3 of DCR lands, so total harvest from DCR lands would be <10% of allowable harvest.

Conclusion:

Forests are long-lived and management impacts are enduring. Recognition of this fact means that responsible forest stewardship which sustains biological diversity of the Commonwealth of Massachusetts requires a long-term view and commitment to adaptive, science-based resource management especially in the context of ecological and societal uncertainties. While the FFVP document mentions DCR's use of evaluating the costs and benefits of certain management actions, DFW counsils DCR to also consider the unintended consequences of the recommendations on the future of Massachusetts forests. DFW recommends that DCR engage in enhanced coordination and adoption of management approaches similar to the DFW forestry program model.

References

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From: Gene Theroux [REDACTED]

Sent: Fri 2/19/2010 1:20 PM

To: MA Office Disp Resolution

Cc: [REDACTED]

Subject: Comments on Forest Futures Visioning Process

Attachments:  

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Dir Sir and/or Madam:

Attached are my comments on the Massachusetts Forest Futures Visioning Process.

I'm quite alarmed at the amount of clear cutting that has occurred in Massachusetts State Parks, State Forests (such as Savoy from the walk through last July 14th, October Mountain, and other locations).

What's most disturbing is the amount of clear cutting that has occurred in the Quabbin Reservation which I'm quite outraged to the extent of the damage to the forest. Both sides of my family ancestry lived in the Quabbin Valley; earlier in the town of Greenwich and settling in Enfield, Massachusetts. I wrote to that in my comments and provided some imagery of my ancestors' homes and farm houses. I've made recommendations to include the Quabbin Reservation into the Forest Futures Visioning Process and to prohibit commercial timber harvesting and seeking an explanation to what happened there at the Quabbin..

Most recently, I stopped by at the Quabbin yesterday on my way from Southwick to my sibling's home in Chatham and found the attached forest cutting permit by Enfield Lookout which is in close proximity to where several of my great grandfathers lived and I could easily see the clear cuts on Prescott Peninsula. I can assure you that all members of my family are quite upset with what appears obvious to us is the mismanagement by MA DCR of the forests in the state parks, state forests, and the Quabbin Reservation which we hold the Quabbin as sacred lands.

We will be closely monitoring the results of the Forest Futures Visioning Process and I will continue to be fully engaged to protect our public lands from commercial logging harvesting.

With the push for woody Biomass power plants by the Deval Patrick administration – it's just unimaginable what will happen to the forests if any of these four proposed plants are built in WMASS from what we've witnessed in the last two years.

Thanks,

//signed-GHT//
Gene H. Theroux

[REDACTED]
Southwick, MA 01077-0856

dcr



COMMONWEALTH OF MASSACHUSETTS
Department of Conservation and Recreation
Division of State Parks and Recreation

FILE # 309-3574-8

W

FOREST CUTTING PLAN CERTIFICATE

Post this in a conspicuous place within the area in which the harvesting operation is to take place.

This certifies that DCR-DWSP Ware Road Belchertown in accordance with the
(Name of Owner) (Address)

provision of M.G.L. Chapter 132, Section 40-46, filed in Amherst, Central Region with the Dept. of Conservation
and Recreation, Division of State Parks and Recreation, a Notice of Intent to cut forest products upon the
Quabbin Park Rd. lot # R15008, Ware

Approval Date 2/6/2008

Director's Agent Carmine Angeloni

DCR Phone No. (413) 545-5750
(413) 545-5752

ISSUED BY: Priscilla E. Geigis

Priscilla E. Geigis, Director
Division of State Parks and Recreation

GENE H. THEROUX
[REDACTED]
Southwick, MA 01077-9707

DCR Forest Futures Visioning Process Comments
c/o MODR University of MA Boston
100 Morrissey Blvd., M-1-627
Boston, MA 02125
Via: MODR@MAFFVF.com

February 19, 2010

Dear Sir and/or Madam,

I am writing to you regarding the Massachusetts Forest Futures Visioning Process.

Please protect all state public forests, watersheds and parks from commercial timber harvesting. Please include the Quabbin Reservation as being protected. Quite frankly, as a descendent from family (both sides) of former residents of Enfield, Massachusetts (Great Grandfather, Alexander Theroux and my mother's family (Parker) owned several homes and farms in Enfield including the Martindale Farm. I find it simply outrageous that the Quabbin Reservoir Reservation has been ravaged with clear-cutting. I feel that my ancestor's legacy has been severely violated by this mismanagement of the forest and has perhaps endangered the water supply that my ancestors sacrificed their farms, lands, and their homes for the betterment of the community of Boston by providing water to the Metropolitan District Water Supply Commission. The Massachusetts DCR and DOER touts the success of the woody biomass plant at the Quabbin Administrative building in Belchertown that burns 350 tons of woody biomass a year, but yet the Quabbin Reservation is being ravaged by clear cuts in the forest.

Reference: www.maforests.org/QUABBIN.pdf

Massachusetts currently controls the activities on about 550,000 acres of state publicly owned land, or 11% of its land area. At a time when the world is experiencing deforestation, loss of habitat for wildlife, soil erosion and global warming, I would like the land that is owned by the public to be managed and cared for in a way that contributes the most to doing our share of environmental protection.

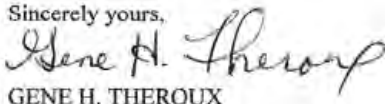
A recent University of Vermont study suggests that the best way to maintain carbon sequestering on forested land is to refrain from any harvesting. Comments in the FSC report have concluded that the majority of Massachusetts residents overwhelmingly oppose commercial harvesting on state owned land. Also, as an opponent of biomass power plants, I am concerned about a study commissioned by the state which shows that 56% of likely wood supply available to be burned in these power plants would come from state forests if harvesting is to be continued.

The current recommendations of the Forest Future Vision Process would put aside only about 216,000 acres of Massachusetts land area of 5,000,000 acres in parks and reserves that would be off limits to commercial logging. This would amount to only 4% of the total land in the state 7 % of Massachusetts' forested land. I am requesting that all 550,000 acres under State jurisdiction to include the Quabbin Reservoir Reservation be set aside from commercial timber harvesting in order to preserve and protect wilderness areas, fish and wildlife habitat, clean water, clean air, tourism income, carbon sequestration, scenic beauty and recreational opportunities in the 3rd most densely populated state of 6,000,000 residents.

Protecting these 550,000 acres would amount to protection for only 11% of the total land area and only 17% of the forested land in Massachusetts which would still provide even less protection than neighboring New York State which has set aside 20% of all of their forestlands in parks and reserves where logging is prohibited. Additionally, considering that the timber program loses money, protecting all these state public lands would be the most prudent economic as well as ecological action.

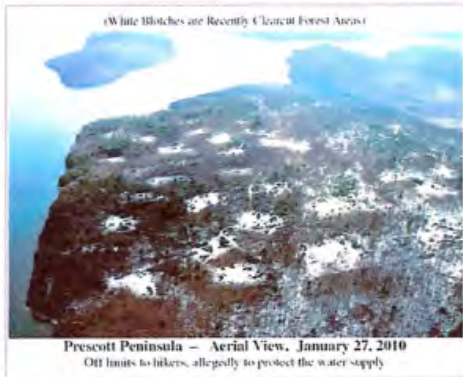
It seems that at a time when we are asking third world countries to protect 25-50% of their forested land for global carbon sequestering, protecting state public lands would be a modest attempt of doing our fair share. After viewing the photos at www.naturepics.org, it is clear a major corrective response is needed now to protect these scarce state public lands for current and future generations.

Sincerely yours,


GENE H. THEROUX

CC: [REDACTED]

The following imagery is of the Quabbin and former homes, farms of my ancestors:



Quabbin photos courtesy of Massachusetts Forest Watch: www.maforests.org/QUABBIN.pdf



My Great Grandfather Alexander Theroux's House



My GGGGF Seth Parker's Farm House (Martindale Farm)



My GGGF Dwight Parker's House that my GGF Fred E. Parker (Enfield Barber) lived in after Dwight's death.



My GGGGF Seth Parker's Hen House (Martindale Farm)

Request an investigation into what happened at the Quabbin Reservation with the clear cutting and that a stop be put to it once. In addition, request full accounting of where the timber went and for what purpose. In addition, if the investigation finds improprieties; request those found responsible to be held accountable and appropriately disciplined, fined, or terminated as appropriate. Please include protecting the forests at the Quabbin Reservation into the Forest Futures Visioning Process and to prohibit all logging at the Quabbin Reservation and to fully protect the watershed, fishery, and wildlife. The end of Enfield, Massachusetts came on August 25, 1939 as the Belchertown-Enfield Road was permanently closed as the bridge was dismantled and the reservoir filled from the heavy rains (Springfield Union, August 26, 1939).

From: mark.ashton@ [REDACTED]

Sent: Fri 2/19/2010 2:22 PM

To: [MA Office Disp Resolution](#)

Cc: [REDACTED]

Subject: re: Forest Futures Visioning Process

Attachments:  [AshKeeKelSey.doc\(39KB\)](#)

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To whom this may concern.

Please find attached our comments the silviculture related to recommendation 7. Should you wish us to expand upon what we have put together we would be happy to do so.

Sincerely,

Mark S. Ashton
Morris K. Jessup Professor of Forest Ecology and Silviculture
Director of School Forests

<<AshKeeKelSey.doc>>

Please find some suggested modifications to the Massachusetts Forest Vision.

Authors: Mark S. Ashton (Yale – CT), Mark Ducey (UNH – NH), William Keeton (UVM – VT), Matthew Kelty (UMASS – MA), Robert Seymour (UMO – ME). We are all Professors of Silviculture and Forest Ecology at our respective institutions.

Recommendation 7:

The recommendation of applying silvicultural guidelines based mainly on the forest classifications of primary, secondary, and tertiary forest seems quite appropriate. Because our specialty is silviculture, we have examined the guidelines carefully, and we recommend three changes to regeneration methods, presumably various types of thinnings and release, though not mentioned in the recommendation are deemed acceptable.

The Level 2 management deals with primary and secondary forests (a substantial part of the State Forest lands). The general approach of small-gap uneven-aged management is most appropriate only for a part of the primary/secondary forests. These forests can broadly be divided into the northern hardwood-conifer type and the oak-pine type. There are important differences between them. In the northern hardwoods, the principal trees of the main canopy of mature forests are shade tolerant (beech, sugar

maple, yellow birch, black birch, hemlock, red spruce). However, many of the principal trees of the main canopy of the oak-pine type are less shade tolerant (red oaks, red maple, white pine, white ash, white oaks, hickories and pitch pine). Applying the guidelines of 1/3 acre opening or smaller will create the same structure throughout these forests. We suggest three changes.

1. In the northern hardwood-conifer type, allow the 1/3 acre maximum opening too be expanded. Small openings (e.g. 1/8 to 1/4 acre) do approximate the average size of natural canopy gaps. However, there is a growing body of research on intermediate intensity disturbances, e.g. - microburst effects. While less frequent, areas affected are typically 1 -10 acres, with very high densities of residual trees, both clumped and dispersed. Therefore a range of gap sizes and retention levels/configurations would more closely approximate the diversity of conditions produced by natural disturbances.
2. In the oak-pine type, allow patches up to 10 acres (with reserve trees retained in the patches) and allow the irregular shelterwood (i.e., expanding gap – several or more age classes) method of uneven-aged management. This will promote the regeneration of the main canopy species of red oak, white pine, and other species of this forest type. Much research has demonstrated this type to be linked to more episodic and larger disturbance regimes related to hurricanes, and Native American cultivation and use of fire.
3. All silvicultural treatments including regeneration methods are applied at the scale of the stand. Stands can take all shapes and sizes and should be guided by differences in site productivity (often indicated by change in species composition and growth, and defined by physiography, and underlying glacial and rock geology), age class distribution (usually determined by legacies of historical disturbance) and competition (stocking is guided by the nature of both disturbance and site). We believe it necessary to highlight the use of scale and its complex application to various irregular shelterwoods and selection systems. Complex age class and intimate species distributions across forest landscapes can be obtained by both shelterwood and selection systems and the continuum of age classes and structures in between them. Disturbance-based systems that provide hybrid approaches, emulating the scale, frequency, and biological legacies associated with natural disturbances, are also of growing interest, and may be desirable in select areas.

From: SLAWW Warner [REDACTED]

Sent: Fri 2/19/2010 2:41 PM

To: MA Office Disp Resolution; [REDACTED]

Cc:

Subject: Forest Visioning Statement

Attachments:

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>> I am writing to urge you to discontinue logging on state public lands,
> which comprise only 10% of our state's land mass. The Quabbin and all
> state forest land should be included for the following reasons:
>
> 1.) To protect our forests from disease and invasives. A 1995 Forest
> Service study shows tree mortality due to both fire and disease actually
> increases in logged areas. The worst rates of disease were on private
> lands where logging levels were even higher and where less natural
> forest remains.
>
> 2.) To start to move away from jobs that harm our environment towards
> those that sustain - Forest Service's own documents show that recreation
> contributes over 31 times more to our economy and creates 38 times more
> jobs than logging. In fact we are subsidizing these cuts with scarce
> tax payer money while studies show that the overwhelming majority of tax
> payers prefer no commercial logging on public lands.
>
> 3.) At a time when we are at the tipping point for global warming, we
> must keep our mature trees which provide CO2 storage and ongoing
> sequestration. (There are many studies just being released that show
> that mature uncut forest provide by far the best CO2 sequestration
> including those from Princeton/MIT and University of Vermont, which I am
> happy to send to you for your review.) We have one of the most
> significant carbon sequestration sinks in the world right here in New
> England forests.
>
> 4.) We cannot ask the developing world to maintain their forests if we
> do not lead by example. Logging on our public lands has a global
> impact. Less developed nations point out that the US is still logging
> its last remaining ancient forests - even on public land. Why should
> they institute strong measures? Forest protection begets forest
> protection. According to Mauriao Fierro of a Chilean forest protection
> organization, "As much as we appreciate direct support from the people
> of the US, the most helpful thing you could do for us would be to stop
> logging in your own forests."
>

> 5.) And as for the argument that we should log our own forests in order
> to save the forests of the rest of the world, the industry's own
> research provides little support for this shifting pressure. A recent
> study by the American Journal of Agricultural Economics shows that for
> every 50 acres of forest protected in the United States and Europe, only
> 2.5 acres of forestland would be lost throughout the rest of the world.
> And this study doesn't address the extent to which a shift to non-wood
> alternatives would compensate for any reduction in logging.

>
> 6.) Finally, I resent the fact that at forums which are supposed to be
> for the citizens of Massachusetts, over 50% of the participants are in
> the timber/logging industry and have been to more than one forum. This
> puts pressure on the rest of us not to speak - especially in those tight
> knit circles, and it stacks the outcome in an unfair way. Continuing
> education credits? Surely you can do better than this!

>
>
> Sincerely,

>
>
> Lee Ann Warner
> [REDACTED]
> Leverett MA 01054

> [REDACTED]
>
>

From: Richard, Dave (DCR) [REDACTED]

Sent: Fri 2/19/2010 3:27 PM

To: MA Office Disp Resolution

Cc:

Subject:

Attachments:  Summary of Comments TSC Report 1 22 10.doc(107KB)  ECV NEWILD Species Survey.doc(39KB)

[View As Web Page](#)

To whom it may concern,

Attached please find my comments pertaining to the draft TSC Report. I would appreciate your acknowledging receipt of my comments. Thank you.

Dave Richard
Management Forester R4
Department of Conservation and Recreation
[REDACTED]
Amherst, MA 01004
[REDACTED]

Comments on 1-22-10 Version of TSC Report

DCR ECV Management Forester

EXECUTIVE SUMMARY:

INTRODUCTION:

478 These groups... It is very obvious in visiting the website <http://www.networkingfriends.net/> that the "interested public" is not interested in management as an option on state forest land. Is it any surprise that they have issues with just about every management project?? If there were members on the Stewardship Council with Forestry backgrounds they would have been better able to separate fact from fiction.

494 The concerns arose... What are the qualifications of these concerned citizens that qualify them to pass creditable judgment on timber harvesting? In most instances outside expertise was brought in to view the alleged misdeeds and never once did anyone with a forestry resource background criticize what they witnessed.

506 Strenuous objections:... The entire tone of the report is negative and even insulting to DCR and its staff. The report begins with the premise that DCR has done a poor job. It seems to take as fact any complaint by any member of the public. The Forest Visioning Process was designed to “develop a renewed vision for management of DCR land” and a committee was convened to complete this task. It seems ironic that while chiding DCR for a lack of transparency the TSC has expanded the scope of its mission to propose major social and political changes for private forests with no representation of private interests.

In commenting on sales in my district that generated controversy, I would challenge any reasonable person to tell me that Chicopee SP is worse off for the management activities that occurred when compared to Robinson SP where the proposed sale was cancelled at great cost to the commonwealth. Hazards, erosion issues, and a forest in decline still exist at Robinson SP and have yet to be addressed four years later. The Holyoke Range State Park issue was an attempt to create a “model forest” in the valley. Opponents did not want a model forest where it was visible !?! The Mt. Grace State Forest was a case of an un-staffed, large diameter dead and dying White Pine picnic area adjacent to a heavily traveled state highway (Route 78). The hazards were removed and the area has fully regenerated since the harvest. Numerous large diameter dead and dying E. White Pine lining the shoulder of the roadway were removed saving the Town of Warwick thousands of dollars with the support and approval of the Selectboard and the Town Tree Warden. The picnic area will not re-open as there is no DCR staff in Warwick. The report portrays the above as poor management on the part of DCR.

How can the fallout from the effects of TSC Report be evaluated with respect to the Bureau of Forestry Programs, when Management Foresters and Service Foresters who implement the bureau’s programs have been denied participation. We have even been gagged at the public forums and told we can’t make comments as a DCR employee. For this very reason alone I am confident that if the TSC report is implemented as written, the vision will implode in ten years or less. Unfortunately in those ten years MA State Forest will incur losses from which DCR may never be able to completely recover.

552 Forest cover... Are you sure forest cover 63% of the landscape? Our in-house GIS person claims the current number is closer to 53%.

608 Growth of DCR forest... As best as I can tell, tropical forests sequester carbon at a rate of 4.3 to 6 times greater than temperate forest. Why are we advocating placing our forest in reserve at the global expense of contributing to the destruction of forest else where that have a much greater potential to sequester C?? The policy is a classic example of what is described in the publication. *The Illusion of Preservation, A Global Environmental Argument for the Local Production of Natural Resources* (M. Berlik, D. Kittredge and D. Foster . 2002. “The Illusion of Preservation, A Global Environmental Argument for the Local Production of Natural Resources” Harvard Forest Paper No. 26, Harvard Forest, Harvard University, Petersham, MA. 2002.).

615 Included in the DCR ... DCR properties may be some of the largest blocks of forest in the Commonwealth but for the most part the parcels are fragmented by town roads and scattered housing

development. It will be very difficult to find or create un-fragmented 15,000 acre blocks in the Connecticut Valley District (ECV).

A VISION FOR MA FOREST IN 2010:

631 TSC envisions..... Is this report suggesting a cap on the MA population and that no further development be allowed?? Will families have to file for a reproduction permit in order to have a child 😊 ! Will we have a waiting list for anyone who wants to move into MA? One coffin out, one newcomer allowed into MA....

639 To accomplish this... To realize the proposed goals will require severely limiting landowner rights.

649 In 2110... No one who is remotely familiar with private forest land would believe the statement that **“private forest will serve as the engine for an invigorated local wood products industry and a supply of local forest products”**. Most private forest land has been poorly managed and “high graded”. A forest rotation requires 80 to 100 plus years. With the current turnover in ownership, 6 different land owners over the course of one rotation are very likely. Keeping that many different landowners focused on a long term goal is unrealistic and unlikely. Long term public ownership has always been a strong positive factor for state lands forest management at least before the policy to “manage state forest by public consensus”.

FACTS: Source NE Forestry Foundation Winter 2009 newsletter

85% of NE Forest is in private ownership.

Since 1990, fully two thirds of the Northern Forest has changed ownership.

40% of the family forestland in NE, almost 5.5 million acres has owners 65 or older.

43,000 landowners controlling 1.75 million acres plan to sell some or all of their holdings over the next 5 years.

28,000 owners controlling 500,000 acres plan to subdivide.

At present it is estimated 89% of the timber harvested in the US comes from private lands. The question is how much of the timber harvested was harvested with the objective of short term vs. long term sustainable management by the land owner?? Once a private parcel has received two harvests in one forest rotation classified as a “Commercial High Grade” the parcel has been ruined as productive forest land until such time the stand is salvaged, regenerated and returned to a productivity. In the absence of biomass capabilities you are looking at an out of pocket cost in excess of \$150.00 dollars per acre to return these lands to productivity.

649 In 2010... Most private landowners do not consider harvesting timber from their property until they are faced with a monetary crisis. At that time their management decisions are based on what will bring the greatest monetary short term return; not what are the best management practices they could

follow. 8% of MA cutting plans and 13% of NY cutting plans are for short term management (Commercial “high grades / diameter limit cuts). This does not even consider those harvest which are for liquidation or land use conversion for development purposes.

669 Ideally uneven aged management... Un-even aged management is no better than even aged management. Un-even aged management on managed lands, combined with large acreages of unmanaged reserve lands will **decrease diversity** by gradually shifting state forest lands to shade tolerant species (in my district American Beech and Eastern Hemlock both of which have serious associated health issues). This shift will result in less tree species diversity. We already have an imbalance in age class on state lands which will be exacerbated by the proposed reserve policy resulting in a further decrease in “age class diversity”. Age class diversity as well as tree species diversity is crucially important to forest health and to our native wildlife species most of which require access to early succession habitat. Aged forests have the least amount of vigor, and are the most susceptible to insects, disease and catastrophic events. It makes no sense to me why any land managing agency would want to take this course of action. The policy is not sustainable and I am confident will result in the scrapping of the plan in ten years or less.

Facts: Source Cornell Univ. Forestry Webinars. “Enhancing Forest Biodiversity”

The greatest species diversity occurs in moderate to heavily thinned stands due to greater vertical structure therefore maintaining habitat heterogeneity.

A computer search was conducted for the species of reptiles, amphibians, mammals and birds native to the DCR, ECV Management district. The **NE WILD** program which is a part of the NED Ecosystem Management Decision Support suite of Management Programs developed by the USDA Forest Service, NE Forest Experiment Station, Burlington, VT was the program tool utilized to conduct the species search. **See the attached results.**

674 Large forest reserves... I would like to see the placement of these reserves in my district. 15,000 acres would nearly equal all the DCR land in two of the following three towns: Warwick, Erving, Wendell. With the dispersed settlement pattern of the area numerous households would be impacted by being surrounded by a forest reserve and subject to all the inconveniences and risks created by the level of stewardship allowed on a reserve. (i.e. Forest fire, Power outages, blocked road access, poor road maintenance etc.) Has this segment of landowners been made aware that their property will be targeted to achieve an additional 90,000 to 130,000 acres of Reserve Forest for the future?

686 Active timber management including salvage... This comment is laughable. In the event of a catastrophic event there is no way a political agency like DCR will be able to resist a public outcry to take action regardless of what the Reserve policies state. DCR always concedes to any vocal public outcry without exception.

RECOMMENDATIONS OF THE TECHNICAL STEERING COMMITTEE:

759 that a wide array of tools... Why is the TSC report stressing mainly “un-even aged management” and emphasizing “the group selection harvest method” and basically eliminating “clear cutting” as an option? This is not what I would call “maintaining a wide array of tools in the land manager’s toolbox”.

776 of the assured very long term... This is the very reason state forest land is best suited over private land for forest management purposes. It should be also noted that managed forest also provide ecosystem services and in many cases much more effectively than reserve forest lands.

786 This allows a clear... There may be a clear difference in the service provided by the three zones however there is absolutely no difference in the life cycle of the trees growing in the three zones. Forest in all three zones face the same environmental stresses, weather related events and the same insect and disease challenges. The biggest difference is how we decide to “hand cuff” ourselves in dealing with these issues in each of the zones. How much unnecessary additional cost is DCR willing to incur?

812 the goal is to create... There already are examples of “sustainable forest management on DCR lands” that could serve as examples to improve practices on private lands. There are over 231 documented historical timber sales in the ECV district alone. No concerted effort has ever been made to staff or develop an interpretive program to educate the public.

814 for a shift away from even aged management... The TSC report is out of line in making this recommendation. There is absolutely no scientific reason to take this approach. (Refer to **669**). Is this maintaining a wide array of tools?!?

RECOMMENDATION 1:

923 In recent years... The charges referred to in the report are allegations by a small group of very vocal opponents to timber harvesting. The TSC report like DCR management, has immediately “thrown DCR Forestry staff under the bus” assuming “mistakes were made” , “the management was inappropriate” and that DCR staff is guilty until proven innocent. DCR as an agency has consistently refused to defend itself with respect to news articles, editorials and libelous web sites. Over time in the absence of a response to accusations, the public begins taking these accusations as truth since the agency never has bothered to respond. It should be noted DCR field staff has been issued a directive or “gag order” not to respond to any accusations. The above policy is a large part of the reason DCR is entangled in the present controversy.

935 represent only a small portion... The TSC report states “DCR’s lands may represent only a small portion of the state’s public and private forest and make a minor contribution at present”. The statement is a half truth! DCR lands represent some of the state’s best managed lands, always managed for long term sustainable forest management unlike its private lands counterpart. The Bureau of Forestry has never been fully staffed over my 34 year career and isn’t fully staffed at present. Timber sale revenues may be a small portion of DCR’s overall budget but are a big part of the Bureau of Forestry budget. The agencies money sump isn’t the Bureau of Forestry!

944 creation of model forest... If your objective is to create model forest, why is TSC limiting types of management, harvesting systems allowed, imposing arbitrary equipment limitations and requiring unreasonably large buffers around timber sales?

RECOMMENDATIONS 2:

1012 qualifications... No mention is made of any on the ground forest management experience. What could be a major improvement over the current situation will ultimately fail if the new commissioner has no understanding of how all the pieces fit together (i.e. ecology, biology, silviculture etc.). For the system to function effectively the incumbent must have an understanding of how any policy change will affect the entire forestry program and preferably years of experience in a resource management capacity otherwise the realignment will miss the intended objective.

RECOMMENDATIONS 3:

1034 Recommendation... Reducing the amount of private land fragmentation is a worthy objective but likely not an attainable goal. It is easy for an individual who lives in an apartment or owns a home on a quarter acre house lot to suggest that a forest landowner with acreage should not be able to develop or subdivide their property. What if that forest landowner is money poor and land rich and owned the land as an investment? What if that landowner wishes to subdivide the property among his children? When a landowner donates a CR, the value of the development rights (house lots) is appraised and the donor has to take a 50% mandatory year one deduction off his or her gross income prior to figuring federal taxes and has 15 years to use up the full value of the appraisal. The land owner gets to realize in real dollars approximately 20% of the appraised value of the donation. For example a donation appraised as having a value of \$100,000 would realize about \$20,000 saved on federal taxes. Not everyone is financially able to be that generous. There is little money to buy development rights off forest landowners where the land owner is fully compensated for the development rights. With house lots in western MA often times having values in excess of \$100,000.00, it will take many millions of dollars to purchase development rights to the levels suggested in the TSC report. Where will that public money come from?

1057 Developer would be required... The logic of replacing forest canopy is flawed. Purchasing CR development rights on existing forest land is not replacing forest cover lost to development! The forest land is already forested; the developed land is losing forest cover. This is not replacing forest land / cover. The planting of new forest land on open land is not really replacing forest cover either. In our temperate climate no open land will remain open unless it is regularly mowed or burned to retain the open condition. All open land will become forest land on its own in a very short amount of time unless maintained as open land. Your front lawn will turn to young forest in a few growing seasons if you stopped mowing the lawn. The only way to truly replace forest land is to create new land and I am not aware of any mortal having that capability.

1114 Continuance of cost share... I do not believe we should be wasting cost share money on new management plans. If a land owner is unwilling to foot the cost of a management plan for which he or she will recoup the investment in the first or second year of the plan the landowner is unlikely to follow

or implement the plan over time. Cost share monies should help pay for practices on managed forest land that has a track record of good management over a period of years. These are the individuals who have demonstrated initiative and commitment to a standard of excellence. Money consistently gets thrown at new first time plans and there is seldom any funding available for existing long term forest management landowners.

1140 Create a state tax credit for 100%... Forest land owners already get generous tax breaks for enrolling in existing tax credit programs. Some of the programs don't even require the harvesting of forest products! Where is the money to fund this proposal going to come from? Should we further reduce teachers in the classroom, lay off more police and fire personnel, further increase property taxes or further reduce state payments to cities and towns?? More government doesn't guarantee better forestry; more than likely more government just increases the number of hoops and makes management activities cost prohibitive. There is no better example than this TSC report.

1161 Chap. 61 should... The ecosystem services provided in good forest management are by products and benefits of good forest management no further compensation is needed. A healthy vigorous managed forest provides the mentioned benefits free of charge as a matter of fact much better than a reserve forest!

1170 Require licensed forester... Licensed forester signature on Cutting Plans should not be required. A forest cutting plan has clear requirements that have to be met regardless of whether the plan was prepared by a licensed forester or a land owner. If a plan is submitted that is lacking, the service forester simply rejects the plan until the required standards are met. The suggestion of not needing Service Forester oversight due to a licensed forester signature is ludicrous. To extend the same logic we should lay off all traffic police and registry employees as we are all licensed to operate a motor vehicle and therefore would never think of violating traffic regulations. The same logic goes for licensed building, plumbing or electrical contractors. They all have to be licensed to work in their trade and therefore would never violate building codes even if there were no building inspectors!!

1201 service foresters to spend... Service Foresters are constrained by strict "conflict of interest laws" as to what they can and can't do for the private land owner. They can provide unbiased third party suggestions as to available management options and that is about it! They cannot provide any service that will take away potential employment from private consulting foresters (i.e. management plans, timber sale marking, cutting plans).

RECOMMENDATIONS 4:

1205 Recommendation... Zoning of lands is not a new idea to DCR. We have been zoning agency lands since the 60's. Labels have changed over time but the intentions have remained basically the same. The committee is taking more credit than they deserve.

1216 Forest Reserves... Ecosystem services are provided equally as well on managed forest land and there is absolutely no scientific evidence to the contrary. Not only are ecosystem services provided but quality forest products are also produced as well. This does not mean **true** reserves are not needed but

rather that they should occur as a sensible, sustainable percentage of your total land holding. I have never seen recommendations that advocated placing more than 15% of your total land base in reserve.

1252 Any timber sales... The statement that all timber sales should focus on un-even aged management makes no sense at all. It would be like saying only Western Medicine can be practiced and all surgery procedures must be done arthroscopically!?! The type of management should be up to the forest manager to decide and should be based on soils, managing for site suited species and a silvicultural method that is best suited to achieve the objective. In the glacial till soils of the ECV district where Red Oak, White Pine and Eastern Hemlock are the feature species, Uneven Aged Management utilizing group selection is not the best management course of action and is not supported as being so in the literature.

1267 implementation of a robust public... All a robust public process to vet and finalize allocations does, is remove management decisions from those trained to make the decisions and places the decision process in the hands of the untrained lay public. This method of implementation provides a “criticism proof vest” for management; and when the system implodes management shoulders will shrug and all that will be said is “That’s what the public wanted”!! This method of management shirks responsibility for the management of public lands and is not supported by those of us in the field who take our responsibilities seriously.

1284 large well buffered... It will be interesting following this process. The MA population figure ranks 15th in US population, in a state that ranks 44th in size. The MA population density is 809 people per square mile which ranks 3rd in the US. These demographics in my opinion make the recommendations of this report risky and likely unworkable. I don’t know of potential 15,000 acre reserve sites in my district that wouldn’t contain numerous in-holdings.

1329 at least 40,000 and as much as 130,000... I would like to know where the supporters of this recommendation plan to get the necessary funding to reach these goals. You are talking millions of dollars and a large number of unwilling sellers... This is the same agency that cannot afford to staff its parks and maintain the facilities it currently operates. A number of towns in the northern part of my district have 8,000 or more DCR acres in their town but have ZERO DCR staff that work there. Land whether it is private or public that lacks the presence of a landowner or lacks the presence of staff gets seriously abused / vandalized over a very short period of time and soon becomes an eyesore and the site of serious environmental problems.

1358 the legislature codify... This statement exemplifies the naivety found in the TSC report. You don’t need to codify recommendations that can stand on their own merit. When resources are scarce and when reserves begin creating forest health and safety issues, laws that codify the recommended TSC policy can and will be repealed or reversed.

1366 bootleg or rogue trails... DCR cannot control illegal trails now, how will DCR be able to control illegal trails on thousands of acres of un-staffed forest reserves?

1368 motorized trail networks... Motorized trail networks especially ATV's and Dirt Bikes are an incompatible state forest recreational use. I have never seen an area heavily used by these two forms of motorized recreation that didn't show extensive site degradation. Why doesn't the agency have the backbone to simply state these forms of recreation are not compatible with the MA State Forest System?

1524 Discussion... As stated before trees do not grow any differently in a Parkland vs. a Woodland. Trees in Parklands are subject to the added abuse provided by intensive recreational activities. Picnic area and Campground area forest health issue are prime examples. DCR spends little or nothing on maintenance of its parklands particularly in Western Massachusetts. Over the years services in timber sale contracts have been the sole source of maintenance dollars and main vehicle to accomplish corrective measures in parklands. I look forward to seeing how corrective measures will be accomplished in the future in the absence of timber sales with declining budgets and reduced staffing! I suspect our parklands will suffer greatly.

RECOMMENDATIONS 5:

1591 reserve management with ... Until the first member of the public complains!

1665 Activities that may be allowed... No motorized vehicles should be allowed in reserves. Wildlife studies have shown snowmobiles have well documented negative impacts on wildlife during the winter months. All reserve uses should be dispersed, non consumptive uses without formal trail systems.

There is no means to enforce any of the guidelines. DCR is unable to control un-authorized motorized use or illegal trail construction on its lands now. The allowed uses in reserves create uncontrolled variables that will invalidate any or most of the research conducted in reserves. Any study conducted in a DCR Reserve Forest would not pass peer review of the study in question.

RECOMMENDATIONS 6:

1757 In these zones... Make sure to allocate a massive parklands maintenance account!! Commercial tree services get anywhere from \$100.00 per six inch tree removal to well over \$1,000.00 per sawlog size tree removal. DCR has yet to complete 2008 ice storm clean-up in many of its recreation areas.

1766 Commercial timber harvesting... Commercial timber harvesting has never been a management objective on parklands. To the professional forester there is a difference between timber production as a management objective and using a timber sale as a management tool. The issue is the lay public not understanding the difference.

1778 natural events... This is another classic example of naivety in the TSC report. Campgrounds do not have high value trees. Campground trees are full of defect from years of camper abuse and are full of hardware making the trees unsuitable for milling into lumber. For a venture to be profitable to a logger, requires a minimum of ten to twelve acres and a volume of 50 cords or 25,000 to 30,000 board feet. 50 cords or 25,000 board feet is the minimum volume required to file a cutting plan. The topic concerning professional arborist has been previously discussed in **1757**.

RECOMMENDATIONS 7:

1853 uneven aged management... The fallacies of Un-even Aged management has been previously discussed numerous times in my comments.

1892 Sorry... I'm sorry but the contents of page 47 are not worth the cost of a match!! The science and logic of page 47 is totally lacking.

1895 practices will need to evolve... There is no question the practices will need to evolve. I do not believe the TSC report as written can last longer than ten years.

1945 1830 forest history maps... Most management foresters who know their district have serious issues with the Harvard Forest 1830 Forest History maps. The levels of map accuracy are very suspect and on the ground evidence often times conflicts with the maps.

1948 Levels of Silvicultural Management... The micro management of silviculture in the TSC Report is not a feasible alternative. The guidelines are limiting and ill advised and do not represent the wide array of management systems and silvicultural methods the wise application of sustainable forest management is suppose to provide. It is much more difficult to change public perceptions than it is to buckle under criticism. DCR and the TSC report have unfortunately chosen the course of least resistance. Those responsible for this report should have their names and addresses in bold print in the Annex of the report for documentation purposes so that they can be held accountable at a later date.

2032 employ hand felling methods... Hand felling methods and cable skidding are a dying form of timber harvesting. Logging fatalities and fishing fatalities compete annually to see which occupation kills the most workers. The pool of loggers logging in this manner is continually declining. Insurance and liability rates are prohibitive not to mention the physical wear and tear on the body. The monetary rewards of hand felling are near the poverty level as production levels cannot keep pace with dropping log prices.

When I do a timber sale mailing for a timber sale showing, on average 80-90 timber sale prospectuses are mailed to prospective loggers and sawmills from all over New England. If six or so people show up for the timber showing you are doing good. Two or three firms may actually submit a bid.

Sometimes equipment limitations are warranted but this decision should be in the hands of the forester and not in the form of a blanket DCR policy. It has been my observations in general over the past five or so years that those who employ mechanized harvesting methods are much more professional, are better business men (they have to be because of their large investment in equipment), do better quality work, complete the job in a timely manner and have far superior utilization. Implementation of the TSC report will kill mechanized harvesting in MA. Most private lots are too small for mechanized harvesting as four or more weeks work per job are needed to offset the \$1,000.00-\$2,000.00 cost to mobilize and set up on a logging job. The ability to respond to catastrophic events

such as the 2006 Wendell State Forest Tornado would have been severely hampered in the absence of mechanized harvesting methods.

2042 are too large and heavy... Any practicing forester will tell you “that they don’t sell the operator with the piece of machinery”. The skill level of the operator in most cases is much more critical than the size of the equipment. I have seen some awful logging jobs harvested with a JD-440 which is one of the smallest skidders available.

2049 interested in working ... What logger in his right mind would re-equip with new machinery at the present day cost of new equipment to be able to work on DCR land, with DCR’s current demonstrated lack of reliability in making wood fiber available for harvest? It’s time for another TSC reality check 😊

2055 Herbivores can disrupt... Herbivores can definitely disrupt the process especially when you are managing by creating small openings. The browse is concentrated in small patches with a lack of browse between patches...that’s a “no brainer”! When you manage in large blocks, 30 to 50 acre blocks, the browse is dispersed over the entire acreage. Some browse gets consumed by herbivores but not enough to adversely impact the regeneration success of the treatment. In 34 years, I have never had herbivores negatively impact my regeneration cuts however most of my management activities practiced even aged management employing the shelterwood method of regenerating forest stands. One of the first elementary lessons of forestry is that you manage by **forest stands** not by the individual acre of forest land. The entire TSC Report misses that point and proposes one recommendation after another that ignores this most basic forestry principle.

2066 representative of the... DCR’s woodlands should be representative of the absolute best practices available. This however doesn’t mean these best practices will be incorporated into private woodland management. Best management practices **all** cost money and do reduce the amount of income a private land owner can realize from a timber sale. All my timber sales call for a minimum of 9 hours dozer time with a competent operator and a 71 S.A.E. flywheel horsepower dozer equipped with a six way angle blade to final grade and stabilize the skid roads on a timber sale. The average private land owner doesn’t bother to stabilize skid roads or attempts to accomplish the task with the short fixed blade on a skidder because six way angle blade dozers cost \$100.00 per hour.

2088 management objectives... Unless FSC abandons its principles of forest management based on science, FSC will never be able to endorse the recommendations of the TSC report. To my knowledge forest management “by public consensus” is not what FSC represents.

2103 It would be helpful... This is a juvenile comment in what is suppose to be a professional report. I would further recommend that bright lights and a rubber hose be utilized however no “water boarding” should be allowed.

2117 woodland zone recommendation... This recommendation is another example of unsubstantiated claims in the TSC report. There is an obvious limit to the number of biomass plants that could be supported in MA; however the number of plants as well as the levels of harvest that could be

sustained has not yet been scientifically determined. It is also possible that concessions such as leaving small diameter limbs in the woods could mitigate some of the potential adverse impacts such as nutrient loss. A blanket prohibition of whole tree harvesting is an incredibly naïve, unwise approach to take.

2125 The TSC is also... This sentence should be rewritten. *'The TSC committee strongly urges the Manomet Study Team to not criticize or report any findings that contradict the recommendations of the TSC Report'*.

2156 woodland zones be appropriately... The principle use of woodland zones should be for forest management. Recreation is a major use of the other two zones as described in the TSC report. This does not mean forest managers should go out of their way to impact recreational uses however when conflicts do arise it should be understood that forest management takes precedence and that the disruption is temporary and that the site will be returned to a condition suitable for recreational use at the completion of the timber sale project. This was DCR's policy back in the days of the DNR and DEM... With the adoption of the recommendation as drafted you can be assured most management projects will be stopped due to perceived conflicts and very little forest management will be implemented.

2162 For nationally and regionally... This recommendation certainly torpedoes the model forest idea!! Let's hide the model forest and put them in places where nobody goes. It also should be noted this recommendation also implies the corollary "let's keep all snags and hazard trees within 50-100 feet of our trails"!!

2168 For all other trails... Same response as 2162. Has anyone on the TSC committee ever looked at the DCR GIS Trail Survey of state forest lands?? The survey looks like a map that had spaghetti thrown at it!! Most DCR land has a maze of random trails covering the landscape making nearly impossible for any management to occur without impacting a recreational trail. Many areas in my district have trails within 50-100 feet of each other.

RECOMMENDATIONS 8:

2213 the goals of this ... If you want this process to succeed and make any sense at all make the managers responsible for a particular zone responsible for developing the plan for the lands in that zone. Park Managers should develop recommendations for Parklands, Foresters should be responsible for the Woodland zone and perhaps ecologist responsible for the Reserve zone. The zone name should indicate what activity / use takes priority in a particular zone. In Parklands recreation takes priority, in Woodlands forest management takes priority and in Reserves preservation of old growth and natural processes take priority. In the report as drafted recreational users take priority in **all** zones and dictate from their perspective what activities are allowable in a particular zone. Reserves are basically another recreation area with no harvesting allowed. Acceptable management practices in Woodlands were determined by whether or not recreational users found the practice aesthetically objectionable. The TSC Report as designed is not a suitable guideline for ever being able to implement the desired goals.

2227 Clarifying the mission... DCR's greatest shortcoming is that DCR has always been a political agency. Controversial decisions are always made according to the "wind sock" of public sentiment and not according to science and the needs of the resource. Until the agency has the backbone to stand up in the face of critics and to do what is right based on the resource no accomplishment of note will ever occur within DCR.

2258 Over time... Keep in mind experts all have an area of expertise and tend to think the world revolves around their area of expertise. They very often lack the ability to recognize the impacts of their recommendations on the rest of the agency and its functions. I often times use the example of Natural Heritage Restrictions on timber harvesting. The salamander lives in the forest, the forest does not live in the salamander! What this statement means is that if forest management cannot be implemented in a manner that insures the sustainability and presence of the desired / required forest type, the salamander that depends on that forest type will be lost anyways.

2304 Keeping up with Science... This seems like a humorous recommendation. It is obvious the committee has placed much greater importance on public opinion than it has on scientific information in drafting the TSC report.

2318 Keeping up with Social Science... Why were the existing forest land owner surveys ignored in formulating recommendations pertaining to private forest landowners?

2376 The TSC conducted extensive interviews... It would appear the feedback from the interviews was extensively screened and watered down. All management foresters were interviewed 45 minutes or more. It would seem interviews of that length with each staff member would result in more than seven bulleted comments.

2420 Create a robust process... It is obvious the DCR Bureau of Forestry cannot operate in a vacuum oblivious to public concerns however there becomes a point where the public process completely paralyses any measure of accomplishment. Over the past few years the timber sale process has become so complicated and extensive that we are on the verge of needing a couple of years time to administer and prepare a single forestry project. I sometimes think it would be easier to site a Wal-Mart than implement a forest management project.

LIST OF ANNEXES: The Annexes were not reviewed due to a lack of time.

The above report is being submitted as part of the ECV Management Forester's comments on the TSC Committee Report.

David A. Richard
ECV Management Forester

██████████
Amherst, MA 01004
██████████
████████████████████

FOREST TYPES AND THEIR VALUE TO WILDLIFE

A search of the species list for the species of reptiles, amphibians, mammals and birds native to the DCR, ECV Management district revealed the following results. The NE WILD program which is a part of the NED Ecosystem Management Decision Support suite of Management Programs developed by the USDA Forest Service, NE Forest Experiment Station, Burlington, VT was the program tool utilized in the species search.

For illustration purposes five hypothetical stand types were selected that represented common forest types characteristic of the ECV district. Two of the five forest types were forest types that would be found in a "Reserve" Zone following an extended period of time in the absence of traditional forest management. Both types are characterized by forest tree and plant species that are shade tolerant and can reproduce under low light intensities under a dense forest canopy. The Northern Hardwood (NH) forest type and the Eastern Hemlock (HK or HH) forest type are the most representative forest types for a non-managed regime.

Three forest types common to the district were selected to represent a managed forest. All three forest types are characterized by tree and plant species that are shade intolerant to semi tolerant requiring a partial overstory removal coupled with site disturbance to eliminate understory competition and to expose mineral soil; best accomplished through the use of forest management. The forest types selected were the White Pine Hardwood (WH) Type, Red Oak Type (RO) and the White Pine Type (WP).

All five hypothetical forest types were described as containing representatives of all size classes namely seedling (regeneration through seedling), sapling (sapling through pole timber), sawtimber and large sawtimber. Forest types were evaluated as being of potential use to all 338 species for B (Breeding Season amphibians and reptiles), B (Breeding Season Birds and Mammals), BF (Breeding and Feeding birds and mammals only), N (Winter use

amphibians and reptiles), N (Winter use birds and mammals), NF (Winter feeding birds and mammals).

Survey results were as follows:

Reserve Zone: (Represented forest types NH and HK)

NH: 176 species or 52% of the species found in New England could potentially use the NH type as described.

HK: 143 species or 42% of the species found in New England could potentially use the HK type as described.

Woodland Zone: (Represented forest types WH, RO, WP)

WH: 202 species or 59% of the species found in New England could potentially use the WH type as described.

RO: 188 species or 55% of the species found in New England could potentially use the RO type as described.

WP: 176 species or 52% of the species found in New England could potentially use the WP type as described.

As shown in the above results, with the exception of the HK type, four of the five forest types were within a few percentage points of one another with respect to use by various species of New England wildlife. What is not readily apparent however is that in making a wildlife species comparison of the NH and HK type as compared to the WH type most of the wildlife species found in the NH and HK type can also meet their life cycle needs in the managed WH type. 149 of the 176 species (84%) of the species that utilize the NH type also utilize the WH type. 117 of the 143 species (81%) of the species that utilize the HK type also utilize the WH type.

In conclusion to the survey conducted, the value of the reserve zone has been greatly exaggerated in the TSC Report. Reserve zones are important as they serve as a control area to which managed landscapes can be compared to unmanaged landscapes. They also serve as an area that may be critical to a limited number of species with specialized habitat requirements. As indicated by the survey 80+/- % of the species that can be found in a reserve can also be found and do utilize a managed forest. It is also quite likely that by implementing some of the management techniques described in A Forest Manager's Guide to Restoring Late-Successional Forest Structure the percentage of species attracted to a managed stand landscape could be increased even more. In light of this information the amount of acreage proposed as a Reserve in the TSC Report is excessive, risky and of exaggerated value with regards to maintaining wildlife species diversity.

NOTE:

While conducting the above searches, some additional searches were conducted to evaluate the value of non-forested upland openings and red maple stands.

Non-Forested habitats: (i.e. Cultivated, Grass, Forb, Shrub / Old Field, and Pasture Openings when located in close proximity to a water source such as a sedge meadow or shallow marsh). 244 species or 72% of the species found in New England could potentially use the Non-Forested Habitats as described. The number of species attracted to non-forested habitat far exceeds the use percentages noted in the forested habitats above and demonstrates the value of maintaining log landings post harvest as non-forested habitat. Additional wildlife value is also realized by having two contrasting habitat types adjacent to one another thereby increasing the potential wildlife diversity.

Non-Forested habitats: (same as above lacking proximity to water). 198 species or 58% of the species found in New England would likely use this habitat condition. The importance of the availability of a water is clearly demonstrated in this habitat scenario.

RM: (Red Maple generally found in moist to wet muck or peat soils in swamps, along slow moving streams or as an inclusion on wetter NH sites). 222 species or 65% of the species found in New England could potentially use the RM type.

The above report was run and is being submitted as part of the ECV Management Forester's Comments on the TSC Committee

Report.

David A. Richard
ECV Management Forester

[REDACTED]
Amherst, MA 01004
[REDACTED]
[REDACTED]

From: bardswan@yahoo.com [REDACTED] Sent: Fri 2/19/2010 3:35 PM
To: MA Office Disp [REDACTED]
Cc: [REDACTED]
Subject: attn: DCR Forest Futures Visioning Process Comments
Attachments:

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DCR Forest Futures Visioning Process Comments
c/o MODR University of MA Boston
100 Morrissey Blvd., M-1-627
Boston, MA 02125
Via: MODRDCRFFVP@umb.edu

Dear Madam or Sir:

I am writing to you regarding the Massachusetts Forest Futures Visioning Process.

Massachusetts currently controls the activities on about 550,000 acres of state publicly owned land, or 11% of its land area. At a time when the world is experiencing deforestation, loss of habitat for wildlife, soil erosion and global warming, I would like the land that is owned by the public to be managed and cared for in a way that contributes the most to doing our share of environmental protection.

A recent University of Vermont study suggests that the best way to maintain carbon sequestering on forested land is to refrain from any harvesting. Comments in the FSC report have concluded that the majority of Massachusetts residents overwhelmingly oppose commercial harvesting on state owned land. Also, as an opponent of biomass

power plants, I am concerned about a study commissioned by the state which shows that 56% of likely wood supply available to be burned in these power plants would come from state forests if harvesting is to be continued.

The current recommendations of the Forest Future Vision Process would put aside only about 216,000 acres of Massachusetts land area of 5,000,000 acres in parks and reserves that would be off limits to commercial logging. This would amount to only 4% of the total land in the state 7 % of Massachusetts' forested land. I am requesting that all 550,000 acres under State jurisdiction be set aside from commercial timber harvesting in order to preserve and protect wilderness areas, fish and wildlife habitat, clean water, clean air, tourism income, carbon sequestration, scenic beauty and recreational opportunities in the 3rd most densely populated state of 6,000,000 residents.

Protecting these 550,000 acres would amount to protection for only 11% of the total land area and only 17% of the forested land in Massachusetts which would still provide even less protection than neighboring New York State which has set aside 20% of all of their forestlands in parks and reserves where logging is prohibited. Additionally, considering that the timber program loses money, protecting all these state public lands would be the most prudent economic as well as ecological action.


It seems that at a time when we are asking third world countries to protect 25-50% of their forested land for global carbon sequestering, protecting state public lands would be a modest attempt of doing our fair share. After viewing the photos at www.maforests.org, it is clear a major corrective response is needed now to protect these scarce state public lands for current and future generations.

Please protect all state public forests, watersheds and parks from commercial timber harvesting.

Celia Rock

[REDACTED]
Pittsfield, MA 01201

Include my comments in the official record for this project, but do NOT send me further documents or put me on any mailing lists.

From: Putnam II, James N [REDACTED] Sent: Fri 2/19/2010 4:28 PM
To: MA Office Disp Resolution
Cc: Smith, Robert
Subject: Ltr - DCR Forest Futures Visioning Process final - 2-19-10.doc
Attachments:  Ltr - DCR Forest Futures Visioning Process final - 2-19-10.doc(481KB)

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February 19, 2010

DCR Forest Futures Visioning Process Comments

C/O MODR

University of MA Boston

100 Morrissey Boulevard, M-1-627

Boston, MA 02125

To Whom It May Concern:

On behalf of Farm Credit East, I am writing to comment on the proposed recommendations of the ***Technical Steering Committee of the Forest Futures Visioning Process***. While I am writing this letter in my capacity with Farm Credit East, I am a life-long resident of the Commonwealth of Massachusetts and spent many years helping my Dad manage the 30-acre woodlot on our family farm in Southwick. I strongly believe in fostering a balance between managing our forest resources for the betterment of people, providing rural businesses with the opportunity to utilize those resources to create jobs and income, and ensuring appropriate environmental protection.

Farm Credit East is a financial services cooperative that provides credit and financial services to farmers, forest products businesses, commercial fishermen and rural homeowners. We provide approximately \$470 million in loans to support farms, forest products businesses, commercial fishermen and rural home owners in Massachusetts.

As a cooperative lender, we are focused on rural businesses that are the economic backbone of many rural communities in Massachusetts. Forest products businesses and farms, which often include woodlots, are vital to many communities in generating economic activity and providing employment opportunities for thousands of our citizens.

The report runs contrary to national agricultural efforts that are currently encouraging local production. The USDA "Know Your Farmer, Know Your Food" is one example of trying to build local networks and enhance the environment by reducing the need for fossil fuels to transport food and fiber long distances. Rather than embracing local forest product production and determining ways to expand it in a sustainable manner, the report recommends actions that will likely reduce local forestry and related farm activity. It is important to consider interrelationships involved in rural businesses – an action that might reduce the number of logging businesses, could have serious implications to farm businesses that depend on income from their woodlots.

As we review the recommendations of the Technical Steering Committee, it would appear that the recommendations fail to balance the diverse needs of all interests in Massachusetts. The forest products industry has been an integral part of Massachusetts since the coming of European settlers in the 1600s and continues to be a positive contributor to the economic, scenic and social fabric that is rural Massachusetts. We encourage the following actions:

- Give full consideration to the economic impact of proposed actions that will limit the Massachusetts forest products industry. To allow a fair assessment, the Technical Steering Committee should define the extent that the report's recommendation will increase unemployment and reduce economic activity in the state. This should include specific impacts to rural communities where forest product businesses are a significant contributor to the local community.
- Maintain the current level of public lands that are available for active forest management and production of timber for local markets. The harvest from public lands is important to the forest products sector, and we do not see justification in the report for reducing or halting the use of public lands as managed forests.
- Delete the unsubstantiated comments and recommendations on biomass facilities. The report states (page 9), "The TSC believes that the expansion of biomass energy facilities in the state poses a potentially significant risk to the ecosystem services that are so important to maintain on DCR forests." While "potentially" allows the Technical Committee to make broad statements, we are unaware of sound evidence to support this statement and ultimately this could lead to policies detrimental to Massachusetts citizens and counterproductive to a more diverse and renewable energy strategy.
- Fully engage representatives of all segments of the forest products industry in a dialogue on the draft report and recommendations. As part of this dialogue, consideration should be given to actions to enhance and expand this industry in an effort to enhance employment opportunities and provide economic growth in rural areas.

In closing, our forests have played a vital role in the development of our state for nearly 400 years. Good forest management, economic opportunity and good environmental stewardship are compatible outcomes – not mutually exclusive. The best strategy for our Commonwealth will focus on balancing all of these in a mutually inclusive strategy.

Thank you for the opportunity to comment.

Sincerely,



James N. Putnam
Executive Vice President

JNP:ncc


From: Herb Bergquist [REDACTED]

Sent: Fri 2/19/2010 4:36 PM

To: MA Office Disp Resolution

Cc:

Subject: Forest Stewardship Comment

Attachments:  MA Forest Visions Comments.pdf(78KB)

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Dear Chairperson Lisa Vernegaard and members of the Forest Futures Steering Committee,

I would like to submit my comments to the Committee regarding the management of our state forest land. Please see attached. Thank you.

Respectfully,

Herb Bergquist

[REDACTED]

Worthington, MA 01098

[REDACTED]



Committee for Responsible Wildlife Management

Amherst, Massachusetts 01004-2537

phone: [REDACTED]
on the web at: www.macrwm.org

Friday, February 19, 2010

DCR Forest Futures Visioning Process Comments
c/o MODR
University of MA Boston
100 Morrissey Boulevard, M-1-627
Boston, MA 02125

Dear Chairperson Lisa Vernegaard and members of the Forest Futures Steering Committee;

As president of a relatively new and small conservation organization here in Massachusetts, which is focused on the responsible use and care of our resident wildlife, I feel compelled to express and extend my concerns on the issue of forest management that we are currently facing. Healthy, diverse wildlife populations are synonymous with, and rely heavily upon healthy forests which make up much of our natural landscape in Massachusetts.

I would like to strongly emphasize my serious concern relative to taking a "hands-off", spectator style approach to the stewardship of our state forest lands. Active forest management practices in Massachusetts have obtained immeasurable benefits for our wildlife, our rural and urban residents, and to the forests themselves. While in some instances, inactive management is appropriate, extending that approach and applying it broadly to much of our state forest lands would be excessively irresponsible. All too often, media campaigns and fantastic images designed to shock and disturb (not unlike what we have seen recently), give an inaccurate picture of the issue at hand. In short, these deceitful approaches do more harm than good, clouding the issue for those who may not be well-versed in the subject, but want to become more informed. Taking a balanced, reasonable approach in regards to forest management, where our forests are actively managed by professionals who care deeply about the forests for the long term is not only important, it's essential. Anything less is a gross disservice overall to the citizens of Massachusetts and the open space we have come to cherish and respect.

Reducing forest management will no doubt harm overall forest health and increase the likelihood of catastrophic fire, blowdowns, or insect outbreaks, and impede the forest's capacity to recover from such events. Forest management is an effective tool for improving habitat. A wider range of wildlife species benefit from managed conditions than from non-managed forests. Restricting harvesting on DCR forests will have a negative economic impact on rural communities. Jobs will be lost, businesses will be closed, and the indirect economic impact of harvesting activity will be lost.

In closing, I have 100% confidence in the forest management professionals that are hired with our tax dollars here in Massachusetts. It is critical that they be allowed to continue to make forest management decisions, without being concerned or restricted by a policy driven by an unbalance agenda. I must have trust in this Steering Committee, in that it will do the right thing here; what's best for Massachusetts as a whole.

Respectfully,

Herb Bergquist
Committee for Responsible Wildlife Management President

CRWM
Email: [REDACTED]
Website: www.macrwm.org

From: Dani [REDACTED]

Sent: Fri 2/19/2010 5:16 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: DCR Visioning

Attachments:

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While we did fill out the on-line questionnaire there are a few more points we would like to emphasize.

1. Although we are members of MFLA we do not agree with its emphasis on moving activities of DCR which serve or regulate private woodlands to the Department of Agricultural Resources. We have found DCR relatively straightforward to deal with but fear DAR is too big a bureaucracy to burden with more activities.
2. We have found the service foresters we have interacted with to be professional, knowledgeable and extremely helpful. We are concerned to have learned that a service forester can no longer immediately halt a wood cut, which s(he) sees as diverging from correct execution. This is a huge mistake. With modern equipment things can go haywire in a half-day with many acres quickly decimated. (That nearly occurred on our 240-acre property despite our personal forester's oversight.)
3. We do not believe DCR can do a good job of directly managing active forestry on the majority of state land, because there is too much political pressure. Management of these lands should be leased out to private concerns.
4. By the way the human engineering of the on-line questionnaire was somewhat poor in that there was no acknowledgement (like thank you for submitting your comments) when we entered our responses. We could not be sure they were properly received. We would also have welcomed a mini survey of our backgrounds *i.e.* landowners, cutting operators, foresters, etc.

[jacklochhead@\[REDACTED\]](mailto:jacklochhead@[REDACTED])
[daniellelochhead@\[REDACTED\]](mailto:daniellelochhead@[REDACTED])

[REDACTED]
Conway, MA 01341
[REDACTED]

From: Megan Weeks [REDACTED]

Sent: Fri 2/19/2010 5:36 PM

To: MA Office Disp Resolution

Cc:

Subject: Forests Future Vision

Attachments:

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To whom it may concern:

The Fate of Massachusetts' Forests is at a Crossroads.

Taxpayer subsidized policies and proposals enacted and promoted by Governor Patrick's office of Energy & Environment

are threatening the health, integrity and peaceful existence of Massachusetts forests. All the benefits provided by these forests

including wilderness protection, fish and wildlife habitat, recreation opportunities, clean water, clean air, tourism, carbon

sequestration and scenic beauty are under threat from proposals to aggressively log parks and forests as outlined below:

- About 80% of State forests and parks are slated for logging with only 20% set aside in reserves.
- Aggressive logging of State forests and parks has already started and new plans call for a 400% increase in logging rates.
- The timber program costs outweigh its revenue. Taxpayers are paying to cut down their own forests.
- The State is subsidizing the development of 5 large wood burning biomass power plants. These plants would add pollution, increase power plant CO2 emissions by 10%, more than triple the logging rate, and yet provide only 1% more power.
- Biomass power plants emit 50% more CO2 per megawatt hour of energy than coal, and 150% more than natural gas.
- The state agencies managing forests are using propaganda to sell the clear-cutting and aggressive logging to citizens.
- Taxpayers are spending millions to "greenwash" the clearcutting of their forests. All photos are of FSC "green" certified logging.
- Five "green" groups "caved" and signed on to the new plans calling for a 400% logging increase in our State forests and parks.

The State agencies are not adhering to existing forestry laws by allowing widespread illegal logging on State lands.

To protect Massachusetts forests and save valuable taxpayer dollars, we call on Governor Patrick to:

(1) Enact strong protective legislation and prohibit commercial logging on State public forests, parks and watersheds.

(2) Stop permitting new wood biomass power plants and exclude them from eligibility for "clean" energy subsidies.

Thank You,

Megan Kelley Weeks

From: Bookends [REDACTED]
To: MA Office Disp Resolution
Cc:
Subject: DCR Forest Futures Visioning Process Comments
Attachments:

Sent: Fri 2/19/2010 6:29 PM

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DCR Forest Futures Visioning Process Comments
c/o MODR University of MA Boston
100 Morrissey Blvd., M-1-627
Boston, MA 02125
Via: MODRDCRFFVP@umb.edu

To Whom It May Concern:

These are my comments that I would like to have included in the Massachusetts Forest Futures Visioning Process. I write as a Massachusetts-born native, a landowner in a forested part of the state, someone who likes to heat their home with wood, and as a person who has some academic knowledge of forest ecology.

I am afraid that we are allowing the state management of our common lands to become negligent. I have personal experience with this, as just 6 months ago the DCR was allowing logging on the Zimmer tract in Chesterfield, very near my house, even after public pressure was put on them to honor the deed restriction that came with the gift of that forest tract, which forbids the removal of any vegetation. It was not until the headquarters of DCR in Boston was embarrassed by TV coverage of the story that they admitted their mistake -- and by that time, trees that were legally protected had been mostly clear-cut.

If this is the kind of management we are getting from the DCR, I think it is very important that legal restrictions on the use of common lands be clear and forceful. The administrators have shown that if there is even a little "wobble room," even a little room for interpretation, that we cannot count on their having the interests of the forests at heart. As another example, the DCR will say that they do not allow clearcuts anymore, that they have agreed to some "environmental" practices document that rules out "clearcutting," but what happens is still clearcutting in practice, if not in name. I have seen the aftermath of their "environmental" practices in person.

I feel strongly that the best use of our common forestlands is as an environmental buffer. We need to leave the forests uncut, for the health of the land, water, and animals (including us!).

Claims that cutting is good for forest health are either based on outdated science or are deliberately misleading. Conservation Biology is a growing field which focusses specifically on management of land for conservation of animals as well as resources, and one of the major conclusions of the past 20 years of Conservation Biology research is that preserved lands need to be large in area and continuous, not small blocks of forest mixed with cuts. The only people who like small clearings cut into the forest are hunters, as game animals like edge habitat and increasing clearings increases the number of game animals. But we cannot allow this narrow-minded vision to control what happens on our common lands. We should use what our scientists are learning about ecology, about managing for a whole environment, not just a target species.

If biomass plants come on-line, it seems they will put enormous pressure on the forests, with more than half of the projected wood supply coming from our state forests. Obviously, from what I've already said, I do not think this is a good idea. Instead, put the forests to work as carbon sinks to do our fair share for preventing further global climate change.

The safest route to go for our future, and our children's future, is to not allow commercial logging in any of our common lands. And from what I understand, the overhead associated with administering a cut exceeds income from these same cuts, so the State government will be saving money by eliminating commercial logging.

It's time to make the DCR's management reflect the department's title, to bring conservation back into forest stewardship in Massachusetts, and to do that we need strict and clear regulations on their actions. The clearest management strategy, the one with the least wiggle room for mismanagement down the line, is across-the-board preservation. I hope we have the vision and integrity to follow through.

Sincerely,

Eric Angell


Chesterfield, MA 01012