

Summary of Comments Received
Proposed Timber Harvest Summaries – July 1, 2008 Posting
Comment Period – July 1, 2008 through August 15, 2008

On July 1, 2008, thirteen Proposed Timber Harvest Summaries were posted at the DCR Management Forestry website:

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

During the 45 day public comment period, DCR accepted comments on these proposed timber harvests. We received a total of 32 comments, 10 of them addressed specific concerns for one or more of the proposed harvests, 18 addressed DCR forestry practices, 3 were letters of support and 1 commented on a proposed timber harvest location that was not proposed by DCR.

The Proposed Timber Harvest Summaries posted on July 1, 2008 (arranged by Management Forestry District and DCR property) were:

Northern Berkshire District - none

Central Berkshire District - 3

Beulah's Red Pine Lot - Chester Blandford SF
Bryan Road Lot - Peru SF
School House Reservoir - October Mountain SF

Southern Berkshire District - 3

CCC Camp - Beartown SF
New Hartshorn - Sandisfield SF
Tolland Blow Down - Tolland SF

Western Connecticut Valley District - none

Eastern Connecticut Valley District - none

Mid State District - 2

Hadley Aiken Red Pine Sale - Templeton SF
Home Fuelwood 2009 - Douglas, Wells, Templeton, Ashburnham and Leominster SFs

Northeast District - 5

Red Pine Middleton Rd 2009 - Boxford SF
Headquarters Red Pine Salvage - Harold Parker SF
Home Fuelwood 2009 - Townsend, Harold Parker, Billerica, Georgetown-Rowley and Willowdale SFs
New Fitchburg Road Fuelwood Series - Willard Brook SF
Old Turnpike Road Fuelwood Series - Willard Brook SF

Southeast District - none

The following three pages list all written comments:

Number	Proposed Sale Nature of Comment	Comment Summary
1	Boxford SF	needs FRMP, proposed methods will result in an unacceptable condition
2	Beulahs Red Pine lot	maintain natural bottom in new culverts for wildlife passage
	Bryan Road lot	
	School House Reservoir lot	appreciates leaving the hemlock stands alone
	General	certify vernal pools, identify rare species habitat
3	General	no forester was in attendance at public meeting in SE
4	Boxford SF	poor harvesting techniques, leave red pine even though non-native
5	Boxford SF	compaction at landing, log top of Bald Hill instead danger of harvesting during hunting season, sees value of selective cutting
6	General	doesn't support logging until plans written and species and vernal pool surveys are complete
7	General	opposed to "dramatic increase in commercial logging of state lands" 19 points disagreeing with DCR's assertions about the benefits of logging and impacts on wildlife
8	General	Response to DCR comments to him from letter #6 above
9	Bryan Road lot	leave more wildlife trees (> 1 or 2 per acre), supports stopping illegal ATV use
10	Beulahs Land Old House Lot	previous shelterwood or clearcuts leave remaining trees more susceptible to blowdown
11	General	wants to be included on timber database for notification, need to do biological surveys before a proposed harvest summary is written, certify vernal pools on DCR land
12	General	poses 77 questions
13	General	believes there is a "radical increase in timber harvesting" and clearcutting, believes the public does not support timber harvesting and that state agencies are using industry propaganda, green certification is a scam, "biomass for power is a disaster", the state parks and forests are being clearcut, and logging illegally
14	Georgetown Rowley, Boxford,	past logging in GRSF was "appalling", landing larger than planned, need for FRMPs
	Bradley Palmer SFs	designate Boxford as a "vernal pool bioreserve", need

Number	Proposed Sale Nature of Comment	Comment Summary
		for independent monitoring of logging jobs, BPSF is very popular, need to quantify usage rates, 6 comments on DCR website and policies
15	General	"...harvesting our forest is an irresponsible move", "Rare is the civilization that survives once it begins cutting down forests"
16	General	complete FRMPs, communicate with public to notify them of upcoming harvests
17	General	supports management of state lands
18	General	supports harvest of dead and dying trees, MA harvesting lacks adequate research, oversight and management, state needs to keep public better informed, worried about biofuels, supports thinning over clearcutting, plans need to address soil erosion and aesthetics
19	General	FRMPs need completion, hold public forums across state, mark trees before proposed harvest
20	Boxford SF	past harvesting still looks bad
21	General	need FRMPs
22	Boxford SF	need FRMPs, done own plant survey, need signs at sites, second round of comments survey results - lot one has great plant diversity compared to lot two
23	Myles Standish SF	no harvests are planned here, all SE parks facing major stress from human use
24	Boxford SF	supports forest management but this sale would create substantial disturbance with a limited
	Red Pine Middleton Rd	benefit, extend review period, need FRMP
25	General	shelterwood is an inappropriate technique, extend 90 day pause
26	General	logging moratorium until FRMPs completed, biomass and biofuels need more study
27	General	write FRMP before any logging is allowed
28	General	unhappy with Green Certification process as it is too lenient, NHESP under-funded, FRMPs should be written by experts in addition to foresters
29	General	supports increased staffing to complete FRMPs and RMPs, supports Green Certification, should engage the public in determining what values are important for the

Number	Proposed Sale Nature of Comment	Comment Summary
		forests, rest of comments are related to the FRMPs, not the proposed timber harvests
30	General	supports the pause and is committed to resolve policy and planning questions and see #31 below
31	General	trend is toward forest loss, fill Stewardship Council vacancies with people from central and western MA, needs completion of FRMPs and RMPs, Management Forestry website is a step in the right direction, need to clarify policies, limit harvesting in areas without FRMP, complete site level resource inventories, supports Green Certification, offer to help with public outreach for proposed timber harvest public meetings; comments on specific FRMPs and the Forest Cutting Practices Act regulations
32	General	too much logging, Green Certification process is suspect and hasn't served the public interest as there is little public involvement and oversight, it serves the interests of the international commercial timber industry, supports logging moratorium

Comments and Responses:

1. Comment: Need to get an approved Forest Resource Management Plan before timber harvesting takes place (respondents #1, 6, 11, 12, 14, 16, 19, 21, 22, 24, 25, 26, 27, 31, 32) and suggests some improvements in the Southern Berkshire, Northern Berkshire and Western Connecticut Valley plans (respondent #31). Limit harvesting in areas without Forest Resource Management Plans (respondent #31).

Response: The Southern, Central, and Northern Berkshire and Western Connecticut Valley District Forest Resource Management Plans have been approved by the DCR Stewardship Council. DCR will limit timber harvesting in the Eastern Connecticut Valley, Mid-state, Southeast and Northeast districts until FRMPs have been prepared and approved. Therefore, in general, DCR will not move forward with the timber harvesting projects posted on July 1, 2008 in these districts. Exceptions to this directive may be made to address specific circumstances such as the need to remove of hazardous trees, mitigate wildfire risks, provide home fuelwood, and in order to implement ecological restoration (see <http://www.mass.gov/dcr/stewardship/forestry/index.htm> for details about DCR's timber harvesting directive. Barring exceptions DCR has decided to not move forward with the proposed timber harvesting projects at Boxford State Forest which were posted prior to July 1, 2008 until the Northeast FRMP is completed.

2. Comment: Georgetown – Rowley SF harvest from three years ago “still remains in an awful state” (respondents #1, 14). Too much slash and high stumps (respondent #4), landing did not revegetate and logs left behind are a fire hazard, the landing is 3 times the proposed size during the initial site walk. (respondent #14)

Response: The Bureau agreed with these comments and additional site work was conducted at the landing which included removing all woody debris and reshaping of the landing.

3. Comment: Need to put “new” on the new cutting plans at the website (respondent #2) or a posted date (respondent #29) and there are no dates associated with 10 of the proposed harvests at our website (respondent #2)

Response: This is a great suggestion and we will make sure to organize our website in a more user friendly manner for the next round of proposed timber harvests. The Bureau recently included the posting dates for each Proposed Harvest Summary in the Master Summary list in response to these comments.

4. Comment: Wants all vernal pools certified and rare species habitats identified (respondents #2, 6, 11) Clarify the state's policies and procedures on protecting resources such as uncertified vernal pools, small streams, and rare or sensitive natural communities that many not be in the existing GIS inventories (respondent #31)

Response: Proposed timber sales go through a process to identify all certified and potential vernal pools before the cutting plan is prepared. All vernal pools (certified and uncertified) are treated identically as certified vernal pools according to the Massachusetts Forestry Best Management Practices and the Forest Resource Management Plan (FRMP) guidelines. The Bureau will submit all vernal pools to Natural Heritage and Endangered Species Program (NHESP) for certification.

Rare and uncommon species are surveyed, inventoried and managed according to the FRMP guidelines. Each proposed timber sale has a survey completed for rare species by a qualified

biologist/botanist. All records are submitted to NHESP for inclusion in their database. In addition, forest harvesting must meet MGL Chapter 132 Forest Cutting Practice Act rare species requirements.

5. Comment: Any time a culvert is being replaced, it should be replaced with one that has a natural bottom for wildlife can use for passage (respondent #2)

Response: Where possible, the Bureau will seek alternatives to the use of culverts on permanent roads. Bottomless arches will be used where practical (sufficient grade and substrate to substantiate this type of structure). In many cases, culverts are used as erosion control measures. In these cases, they are properly designed and sized and will be installed or maintained as drainage devices to move water from the road ditches to areas where less damaging water dispersal can take place.

6. Comment: Appreciates that the hemlock stands will be untouched in the proposed School House Reservoir Lot sale (respondent #2)

Response: The Bureau assessed the forest stand conditions and decided that this was the most appropriate action for this site.

7. Comment: Showed up for the Southeast District public meeting but there was not a forester present (respondents #3, 12). When will the meeting be rescheduled (respondent #3)?

Response: Due to staff changes, we are sorry that no forester was available for this meeting and that the public was not notified in advance of the cancellation. While DCR staff coordinated with the goal of ensuring that a representative would be available at the scheduled meeting, there was a breakdown in communications and as a result, no DCR representative attended the meeting. We will make sure that staff will be available to meet with the public in the future. The next public meeting in this district will be on January 15, 2009.

8. Comment: Feels that Boxford State Forest red pine stands should be left alone, even though they are non-native species (respondents #4, 14). Red pine is a native species on the southern edge of its range (respondent #7)

Response: It is DCR's current policy to restore native tree species to our landscape. In the 1920's and 1930's, red pine was planted extensively as part of an effort to reforest abandoned agricultural land. Red pine is at the edge of its natural range in Massachusetts and therefore is native to the state in some locations. However, most red pine plantations are "off-site" and are growing mostly out of its natural range. The red pine plantations that are being targeted for treatment are not appropriate for these sites. There is a high potential for tree mortality because they are very susceptible to a variety of insects, disease and pathogens which will negatively affect the stand's health. This specific stand has not been thinned, it is presently at a very high stocking density level and of small crown to stem ratios, and subject to significant forest health risks from tree competition for sunlight, water and nutrients. It should be noted that red pine plantations have suffered widespread significant mortality (Martha's Vineyard to the Berkshires) and similar results should be expected in Boxford State Forest. A series of field trips and meetings are scheduled to discuss this forest stand in the winter of 2008 and spring-summer of 2009. Barring emergency situations, the red pine plantation project will not proceed while the Northeast FRMP is developed.

9. Comment: Boxford SF – concerned with soil compaction of the landing and logging roads. Suggests cutting on the top of Bald Hill instead as it would create a nice view (respondent #5).

Response: No new roads will be built under this timber harvesting project but one existing road may need to be straightened out a little and improved for access (including emergency vehicles such as fire engines). Boxford State Forest has a long-term wildland fire history. If there is a timber sale in Boxford State Forest, the landing will be designed to be as small as possible and be rehabilitated after harvesting has been completed.

Beavers have flooded access to Bald Hill on MA Fish and Game Department land which manages the area as a wildlife sanctuary so it is unlikely that they would support removal of the beaver. There is invasive black swallowwort on the hilltop and a Goshawk nesting site on the side of the hill. At this time, there are no plans to create a vista at Bald Hill.

10. Comment: Vernal pools need a bigger buffer for adequate protection (respondent #5)

Response: Buffer zones are determined by the distances specified in the Forest Cutting Practices Act and approved Massachusetts Forestry Best Management Practices which were developed using the best available scientific information.

11. Comment: Logging during hunting season is dangerous (respondent #5)

Response: Often, the best time for harvesting to minimize adverse impacts to the land is during the fall and winter which may conflict with the hunting season. Harvesters often wear orange or bright colored clothing during hunting season so the risk of hunting and harvesting conflicts and injuries are minimal.

12. Comment: Supports selective cutting of the forest (respondent #5) and the continued management of state lands for multiple uses including timber harvesting (respondent #17)

Response: DCR plans and designs all forest management projects in an integrated manner with all resources and uses in mind. Selection harvesting in the form of group selection, uneven age management methods is one of the silvicultural systems often employed in forest conditions such as northern hardwood forests. DCR assesses site conditions, land management objectives, and public concerns to develop a silvicultural prescription that carefully balances the environmental, social and economic considerations.

13. Comment: Public land should not be used for timber production (respondent #6)

Response: Responsible and sustainable forest management on state land is part of the DCR conservation mission, supported by Massachusetts legislation. When properly planned and implemented, sustainable forest management provides many important ecological, social, and economic benefits, such as water quality, abundant and diverse wildlife habitats, carbon sequestration, forest products, renewable energy, and supports local economies.

14. Comment: Opposed to heavy cutting and clearcutting on state land (respondent #7) Why is DCR clearcutting its parks? (respondent #13)

Response: Forest management is planned taking all factors into consideration as one system. The amount of harvesting is subjective. The Bureau's planning of harvesting is carefully accomplished and based on ecological factors such as species diversity, age class distribution and in response to wind, and forest pest mortality and risks. Even age regeneration silvicultural systems (shelterwood and seed tree methods – referred to as heavy cutting by the respondent) are necessary to promote

specific species such as oak, black cherry, aspen, birch, etc. which are important to create a variety of wildlife habitat.

Regeneration by the clearcutting silvicultural method is not a widespread practice and reserved for specific forest stand conditions such as non-native plantations that have substantial or expected mortality from wind, forest pests, or excessive competition in over-stocked stands. In response to this comment, all harvest summaries with clearcutting prescribed will have an additional evaluation by the Bureau to determine that there are no other feasible options. A public site visit will also be required at any location where clearcutting is being considered before the cutting plan is prepared.

15. **Comment:** Clearcutting doesn't not provide the best habitat for early successional species but maintained old fields do (respondent #7)

Response: We agree that maintaining old fields provides excellent wildlife habitat for grassland species. Clearcutting results in early successional wildlife habitat in the form of young (early seral) trees, shrubs, grasses and forbs which are not found in open grass fields and older forests (mid and late seral climax species). Early successional forests provide important wildlife life requirements including breeding, foraging and cover habitat that is not found in older forests. The Bureau considers doing clearcutting projects in rare circumstances, such as when they are associated with ecological restoration projects (such as dead and dying non-native plantations and native forests that have experienced severe mortality since there are additional benefits to wildlife diversity).

16. **Comment:** Early successional habitat is more prevalent now than in pre-colonial times (respondent #7)

Response: Historically, Massachusetts had been well-forested in pre-colonial times. Over time and since the last ice age, forests have developed through the ecological framework of natural and human (native Indian) induced disturbances, resulting in regeneration and growth. Transitional (young early successional) forests have been part of the landscape in varying amounts, shapes and sizes. Today in Massachusetts, due to the amount of development and loss of forests (our greatest environmental threat), natural processes are not within the natural range of variation. Therefore, early successional habitat is lacking which results in a dramatic loss of habitat and noted decline in species that utilize early successional habitat.

17. **Comment:** Non-native Norway spruce is not an intrusive invasive tree and DCR's effort to eradicate is misguided. It is also self thinning and impressive as it ages (respondents #7, 12)

Response: The Bureau is in agreement that non-native Norway spruce is not an invasive tree species. The goal is not to eradicate the species from the landscape but to restore and re-establish Massachusetts' diverse native hardwood forest. The Norway spruce plantations are monocultures that have grown very well for a period of time but are now highly susceptible to rapid decline and death due to their age, susceptibility to windthrow and attack from insects and diseases. In most cases Norway spruce plantations, where feasible, have been thinned or regeneration was planned through a shelterwood silvicultural system. Norway spruce, although not desirable from an ecological and native species perspective, has regenerated and will remain a part of our forest tree species.

Norway spruce "self thinning" observations are not consistent with the Bureau's observations of mature Norway spruce plantations. Typically, when Norway spruce plantations begin dying, within a few short years substantial forest mortality will occur which leads to very high amounts of fuel loading. The Bureau will continue to track this issue and not treat stands that appear to be self-thinning for monitoring purposes.

18. Comment: Clearcutting fragments the landscape and certain wildlife habitat (respondent #7)

Response: The Bureau agrees that clearcutting fragments the landscape and certain wildlife habitats from a canopy, species, and age class perspective. The Bureau has identified Forest Reserves which will have transition zones to protect the identified late successional habitat.

Significant portions of the Massachusetts forest are of a similar age class. Creating openings across carefully selected portions of this landscape creates diversity in the age classes and habitats. This dynamic process changes year to year as vegetation grows and matures. The greatest threat to wildlife habitat from fragmentation of the landscape is development, not clearcutting. Most clearcutting is located in non-native plantations, which were abandoned farmland and along roads, thus limiting the fragmentation concerns since the landscape is already fragmented by the presence of the road.

Noting the public's concerns about clearcutting, DCR has instituted requirement for a public site visit at any location where clearcutting is being considered before any cutting plan is prepared.

19. Comment: Lots of early successional habitat exists in the northeast US in other states (respondent #7)

Response: This statement was made without substantiation of study or reference. Massachusetts has very little early successional habitat in the form of young forests according to DCR Continuous Forest Inventory conducted on State Forest lands and the USDA Forest Service Forest Inventory Analysis conducted on all Massachusetts forest lands. Recent breeding bird surveys continue to report a dramatic decline in habitat and species that utilize this early successional habitat.

20. Comment: Heavy equipment used for clearcutting has more of an impact than the equipment used for uneven age management (respondent #7)

Response: In some cases the equipment used for clearcutting and uneven age management are of the same type and size. Modern mechanized equipment such as forwarders when used to conduct clearcutting and other types of forest management harvesting are more environmentally sound than older skidding mechanisms that are known to be more ground disturbing. Often, it is the time of the year, soil type, and weather conditions that primarily influences the amount of environmental damage associated with harvesting. Silvicultural prescriptions are prepared to design harvesting operations that properly match the site conditions, treatment and method with equipment which will result in the least amount of ground disturbance impact.

21. Comment: The CCC plantations provide important wintering grounds for deer and other wildlife (respondent #7)

Response: CCC plantations do provide winter thermal cover for deer and other wildlife. In Massachusetts winter conditions and the amount of thermal cover are not limiting factors in providing for this type of habitat. In fact, Massachusetts has an abundance of quality winter thermal cover that is more than adequate for all over-wintering wildlife species.

22. **Comment:** Pioneering plant species after a clearcut provide browse for certain wildlife like deer, which is overabundant (respondent #7)

Response: Clearcuts provide habitat for many wildlife species including mammals, bird, and reptile populations that are in decline. It is well documented that early successional habitat (pioneer species) are lacking within the Massachusetts forested landscape.

23. **Comment:** Logging equipment possibly effects the ecology of the soil (respondent #7)

Response: In general, the use of harvesting equipment has minor impact to the ecology of the soil. However, deep rutting, excessive compaction, and displacement of soil and their profiles could lead to longer term loss in soil productivity. Harvesting equipment is designed and monitored to minimize soil damage to maintain the high productivity of the forest.

24. **Comment:** Human intervention is not necessary to help the forest (respondent #7)

Response: Forests will live, grow and die and regenerate without forest management. The larger question is how will our forest resources in Massachusetts provide a myriad of benefits to the 6 million plus residents? For example, diversity of wildlife habitats, improved forest growth and species distribution, efficient carbon sequestration, water, sustainable forest products and renewable energy, and support for the local economy can be provided through human intervention.

Over 20% of DCR's forestlands will ultimately be in forest reserves (areas with minimal human intervention). DCR has set in place a long-term ecological monitoring program in partnership with the University of Massachusetts and an advisory group of scientists to collect and assess data that will address the question of the long-term ecological difference between passive (forest reserves) and active management over time. Also, there are very few forests in MA that have not been disturbed by humans multiple times over the years (only about 1,000 acres of prime old growth and 1,400 acres of secondary old growth) exists and have been included in the forest reserve system.

Reliance by developed societies, including Massachusetts, on other countries such as Russia, China, Brazil, and Indonesia, where there are minimal environmental and social controls, to provide our forest products has led to an overall increase in significantly high carbon footprint. Obtaining our forest products from these countries has led to deforestation because regeneration is difficult, carbon release of high proportions, and profound impacts on wildlife in these countries. Harvesting in fragile environments fragments forests that are truly intact, diversified biologically, and contributes towards the exploitation and cruel treatment of poor and uneducated populations. We in Massachusetts need to consider whether our forests can provide a reasonable and responsible share of the products and energy we all use. This is our contribution to worldwide climate, wildlife, and conservation goals in forests that are managed sustainably with strict environmental and social controls.

25. **Comment:** There is a difference between biological diversity and age-class diversity (respondent #7)

Response: Biological diversity is defined in terms of ecological composition, structure and function which include age class diversity at various scales (such as across the landscape), within landtype associations, and forest stands. Age class diversity is a subset of biological diversity. Age class diversity is the grouping of vegetation by a range of ages such as early successional habitat forest of 0 to 15 years of age or late successional forest of greater than 150 years of age.

26. **Comment:** In order to maintain early successional habitat, it is necessary to degrade the land (respondent #7)

Response: Managing non-native plantation forests that are dying, declining and damaged helps to restore the ecology of the landscape to native species and also creates early successional habitat. What may appear to be degradation of the land leads to healthy and native forest that provide multiple benefits. It should also be noted that less than 100 years ago, many of our forest lands were open farm lands.

27. Comment: Clearcutting to maintain early successional habitat should only be done near areas that have already been degraded (respondent #7)

Response: In general, clearcutting is planned in areas where there are few other silvicultural options due to forest stand conditions and land management objectives. Clearcuts are designed specifically for early successional wildlife habitat and will be located away from forest reserves and intensive use areas.

28. Comment: A model of exceptional forestry is the Gould Farm in Monterey (respondent #7)

Response: Gould Farm is an excellent model of sustainable forestry that meets the objective of the landowners and is consistent with existing forest stand conditions. DCR manages public lands through the balancing of forest stand conditions, standard silvicultural systems, and land management objectives. The use of one silvicultural system across the landscape might greatly reduce biological diversity of DCR lands and is not applicable to all forest types (see various silvicultural texts).

29. Comment: Uneven age management is aesthetically superior to even age management (respondent #7)

Response: Aesthetics are subjective – both uneven age and even age management are appropriate on state lands depending upon site conditions and land management objectives. Both can be aesthetically pleasing. Uneven age forest management applied inappropriately can result in high-grading the forest. The uneven age management in the form of single-tree selection or what is called selective harvesting has a goal of an “all aged forest” and requires a multi-aged forest to begin with or will take generations to achieve. Implementing this system on an even-aged stand (as is most common in MA) will result in an uneven “sized” not “aged” forest with smaller trees in a suppressed condition. The continuous removal of large trees from an even aged forest that leaves behind intermediate and suppressed trees often of similar age leads to poor forest composition, growth and genetics. High-graded forests produce the fewest ecological, social and economic benefits. However, some people feel that because trees are left behind overall aesthetics may be superior.

30. Comment: DCR’s real intention is to dramatically increase the commercial logging of state lands (respondent #7)

Response: The goal of DCR’s forest management is to provide multiple and sustainable forest ecological, social and economic benefits. Forest management over time results in improved forest conditions, maintenance of productivity, and multiple societal benefits including natural infrastructure such as: diverse wildlife habitats, climate control, carbon sequestration, and water and air quality). The statistics cited by the commenter are not consistent with the assumptions and calculations provided by the Bureau (See FRMPs posted on the DCR Forestry website)

31. **Comment:** Leave more wildlife trees than the standard 1 or 2 per acre on the Bryan Road Lot (respondent #9)

Response: The Bryan Road lot will follow the FRMP wildlife and structural guidelines:

Where forest vegetation management occurs, the following guidelines apply:

A. Retain on average at least three live, large diameter (where possible >18" dbh) cavity or den trees per 5 acres, up to a maximum of three trees per acre, either as individuals, or 1/4 to 1/3 acre groups or islands for cavity nesting species. A greater number of trees should be left in riparian areas. Retain 2-5 smaller diameter cavity trees where possible.

B. Retain as many snags and stubs as possible in harvested areas in compliance and consideration of O.S.H.A. "Danger Tree" regulations

C. Retain on average one of the oldest, largest diameter, well formed, dominant trees (where possible > 18" dbh) per acre in harvested areas to serve as legacy trees

D. Maintain at least two cords (256 cubic feet) per acre of down coarse woody debris (material 5" or greater at the tip and at least 4' long) for ground dwelling amphibians, mammals, insects, and nutrient recycling. When available, highest priority will be given to leaving large, cull logs that will remain for long periods of time.

E. Provide a diversity of horizontal and vertical forest structures by retaining both individuals and groups of trees during final release regeneration harvests and by protecting desirable advanced regeneration

32. **Comment:** Appreciates cracking down on illegal ATV use (respondent #9)

Response: DCR has planned for the sustainable use of ATV-OHV. DCR continues to work with the appropriate entities to take enforcement actions against illegal ATV-OHV use.

33. **Comment:** The reason for the blowdown in the Beulah's Red Pine Lot is that it was cut too heavily previously. If more trees had been left, the blowdown probably wouldn't have happened (respondent #10)

Response: There is a trade-off between the risk of managing and not managing non-native red pine plantations (and all plantations for that matter). Not managing plantations results in continuation of non-native forest conditions that are highly susceptible to damage from forest insects and diseases. Placing plantations in forest management has risks such as wind damage and forest pests. Over the past few years, we have had a series of violent heavy rain and wind storms that have affected both plantations and natural forest stands that have been managed and those that have been unmanaged. On the Beulah Red Pine Lot, the blowdown affected the spruce trees, not the red pine trees.

34. Comment: Wants DCR to send out a list of all proposed timber harvests to all interested parties, not just loggers (respondents #11, 12, 14)

Response: The Bureau does not send out (mail or e-mail) a list of proposed timber harvest summaries to just loggers. All Timber Harvesting Summaries are posted on the DCR website for all to view and we encourage participation in this process.

The Bureau also meets the notification requirements in the Forest Cutting Practices Act by mailing completed “forest cutting plans” to town Conservation Commissions and notices to the abutters.

DCR mails out notifications of the availability of timber sale contract bid packages to licensed harvesters who are potential bidders. The public is informed of the availability of the timber sale contract through mandatory public notices published in the local newspapers.

35. Comment: Have all of the proposed timber sites been marked with information signs (respondents #12, 14, 22)?

Response: Yes, all of the July 1, 2008 proposed timber harvests had informational signs posted on-site. Unfortunately, some of these signs may have been vandalized. DCR foresters have been directed to take pictures of all signs when proposed timber sales have been posted as documentation of fulfilling the public notification policy. DCR foresters, when they become aware of vandalized or missing signs will post new signs.

36. Comment: What plans are there for additional public notification of proposed timber sales (respondent #12)?

Response: Our policy is to notify the public via the DCR website and to hold twice a year public meetings. Additional meetings will be planned as necessary. For example, DCR has recently committed to holding public field reviews when clearcutting is planned.

37. Comment: Is there a link between the DCR home page for each property and a proposed timber harvest summary (respondent #12)?

Response: No, there is not. Timber Harvesting Summaries can be accessed from DCR forestry web page at <http://www.mass.gov/dcr/stewardship/forestry/manage/index.htm>.

38. Comment: There should be directions posted at the DCR website about how to get to each district's twice yearly public meetings (respondent #12)

Response: We agree with this suggestion and implemented it soon after the July 1, 2008 postings and before the July 17, 2008 public meetings.

39. Comment: Is there any plan to have a second round of public input on the proposed harvests (respondents #12, 22)?

Response: There is no plan to have a second round of public input on proposed harvests unless a clearcut is proposed, in which case a site visit will be held to present the project and solicit public input. DCR is limiting proposed and all harvests within districts that do not have completed and approved FRMPs (see <http://www.mass.gov/dcr/stewardship/forestry/index.htm> for details).

40. Comment: Have there been any discussions about how to help the ordinary citizen picture what a proposed timber harvest might look like (respondent #12)?

Response: We are considering developing and maintaining a photo library of pre, active and post harvesting pictures depicting various silvicultural systems and what these methods look like after various time intervals, such as 1 year, 2 years, 5 years and 10 years. All staff recently received high quality digital cameras and instructed to begin documenting pre, active and post harvesting conditions. Software that will create visualizations of forest conditions and the results of treatments is available and may be used to help accomplish this suggestion, as well.

41. Comment: Is DCR satisfied that it has done an exemplary job of alerting the public about the proposed timber harvests (respondent #12)?

Response: The Bureau is working hard to fully meet all the requirements of the Public Notification Policy in a timely manner to keep the public engaged in the process and fully informed. DCR is pleased with the many efforts made to date toward public notification and will continue to make this a priority.

42. Comment: Is DCR comfortable assuming that everyone accepts the plans as written in the proposed timber harvests (respondent #12)?

Response: DCR understands that there has been and might be a continued diversity of opinions on forest management, forest resource management plans, and harvesting plans. We welcome and value the diversity of comments and public participation and understand that there may not be a consensus concerning timber harvesting.

43. Comment: Why is Robinson State Park still listed in the Master Summary List (respondent #12)?

Response: Robinson State Park was erroneously included in the Master Summary List and it has since been corrected. Robinson State Park was not listed as an active proposed timber harvest.

Depending on the availability of funding, DCR intends to treat portions of Robinson State Park's red pine plantations. Please note that all areas that may have vegetation planned for management are posted on the DCR website, for the purpose of full disclosure and public information.

44. Comment: Windsor State Forest – Why does the Windigo Road proposal have question marks in the Master Summary List? (respondent #12)

Response: This proposed timber harvest is no longer listed on our website.

45. Comment: Windsor State Forest – What is the official title of the area and subarea near Windsor Jams? Is part of it a park? (respondent #12)

Response: The entire area is part of Windsor State Forest.

46. Comment: Windsor State Forest –Has there been a study of the tourism value, the camping site there, the use of the property for many recreational activities? (respondent #12)

Response: There has not been a specific study of the tourism value at Windsor State Forest. Windsor is one of 29 campground facilities and 88 beach facilities throughout the Commonwealth and is one of the least frequently-visited of these facilities. In 2008 DCR initiated a customer survey program in

partnership with the University of Massachusetts designed to provide the agency with greater information regarding our customer's preferences for a variety of recreational activities. While Windsor was not one of the designated survey locations, the survey site selection process is intended to provide DCR with information that can guide decision making at a variety of similar properties.

47. Comment: Windsor State Forest –Have tourism companies been contacted to gather opinions on the impact of previous and recent widespread cutting? Have the campers been surveyed? (respondent #12)

Response: DCR through the Bureau of Recreation has conducted a survey of visitors which includes Windsor State Forest for many years. The survey is available at many facilities as well as on the DCR website www.mass.gov/dcr. Feedback this season from campers at Windsor was overall positive, rating highly both the quality of the staff and the campground. Specifically it is not known if tourism companies are part of the survey. There has not been any specific outreach to any tourism companies regarding past or present harvesting.

48. Comment: Boxford State Forest – Has it been studied for its potential as a small reserve? (respondent #12)

Response: Potential for Forest Reserves at Boxford State Forest has been previously discussed with the public and is currently being assessed as part of the Northeast Forest Management District FRMP process.

49. Comment: Boxford State Forest – Has there been a study of the impact of harvesting in minute detail? Why not? (respondent #12)

Response: Inventories, biological surveys, road and trail inventories and condition surveys, including a series of public site visits, have occurred at Boxford State Forest. Sufficient information is available to make resource, management decisions in cooperation and coordination with the public. As previously stated, harvesting projects at Boxford State Forest will not be implemented until a FRMP is approved, unless there are conditions to warrant an emergency exception (for details, see <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

50. Comment: Boxford State Forest –What is the urgency to cut there? Explain why enhancing the large oak matrix to benefit neotropical birds is urgent. Which species will benefit and which will suffer? (respondent #12)

Response: There has not been any urgency related to the Boxford State Forest project, which was proposed almost two years ago. Boxford State Forest provides a great example and comparison between managed and unmanaged forest conditions. Adjacent Division of Fisheries and Wildlife oak forests have not been managed while portions of the State Forest have been thinned. The purpose of the proposed project is to slowly begin small scale regeneration of oak through the “group selection uneven age management” silvicultural method. This diversity will provide for the continued presence of oak forests and diverse habitat for all species, including neo-tropical migrant birds. As previously stated, harvesting projects at Boxford State Forest will not be implemented until a FRMP is approved unless conditions warrant an emergency exception (for details see <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

51. **Comment:** Is it DCR's policy not to cut hemlock in riparian buffers and until they are greater than 50% effected by the hemlock woolly adelgid (respondent #12)?

Response: The following is the hemlock woolly adelgid direction for State Forests contained in FRMPs:

Address hemlock woolly adelgid (HWA) risk by:

1. Surveying hemlock stands with greater than 50% stocking of hemlock for the presence of HWA
 2. Considering the selection of representative hemlock stands for long term protection from HWA by environmentally safe biological control and use of systemic pesticide
 3. Considering hemlock stands for treatment (regeneration, thinning, or salvage) when the majority of the hemlock trees (greater than 50%) are infected with HWA
 4. Considering hemlock stands for thinning to improve tree vigor and possible resistance to HWA infestation
 5. Collecting hemlock seed from representative hemlock stands to be stored in genetic banks
52. **Comment:** Are the red pine and Norway spruce in Beartown, Tolland, and Harold Parker SFs dead? Is there documentation that these are dead if they are claimed to be dead? If they aren't totally dead, can they be thinned instead? (respondent #12)

Response: DCR does not believe that all red pine and Norway spruce trees located within these properties are dead. Prior to July 1, 2008, the Bureau did not always document dead trees. Since July 1, 2008, digital cameras have been purchased and staff has been directed to document as many stand conditions as possible especially when there is dead, dying or serious forest health conditions prior to harvesting operations. When considering plantations for forest management, the following is the recommended approach:

Plantations where the majority of stocking has crown to stem ratios of at least 30% live crowns may be thinned.

Plantations that do not have sufficient stocking and the majority of crowns ratios are below 30% live crown ratio may be regenerated through the reserve shelterwood or seed tree systems.

Plantations where there is widespread mortality and few trees have potential for survival may be regenerated by the reserve clearcut method.

Exceptions may be plantations that are highly prone to wind damage, high wildland fire risks such as Southeast Massachusetts and Montague Plains, and ecological restoration projects to restore rare and uncommon vegetation communities such as scrub oak/pitch pine forests or sandplain grass types.

53. **Comment:** Does DCR think that some concession has to be made to the public who would probably categorize clearcuts as too harsh (respondent #12)?

Response: The impacts of clearcutting can be harsh and result in the largest change in the landscape and aesthetics. As previously stated, this method is used when stand conditions leave very few options for other treatments and to provide habitat that is presently lacking within the landscape. Clearcuts restore non-native monocultures to native and diverse species. The practice mimics the results of a natural disturbance such as wind, insect and disease or fire that create an opening in the forest cover.

54. **Comment:** Is someone trying to give State Parks, Forest and Reservations different designations so that Parks and Reservations might be excluded from timber harvesting? (respondents #12, 28, 29, 31)

Response: DCR is considering various levels of land management designations and looks forward to engaging the public in a dialogue about this subject. The current and future condition of our forests vegetation, climate change impact and adaptation, providing diverse wildlife habitat, long-term watershed protection, public safety, costs and economics, etc. are needs and considerations of all forestlands that need to be analyzed as part of the discussion and decision about where timber harvesting might be appropriate. It should be recognized that forests are dynamic and have biological limitations vs. being stable with no limitations.

55. **Comment:** How can foresters balance the needs for aesthetics, recreation and tourism and still meet the goal to have world class parks (respondents #12, 18)?

Response: Proactive sustainable forest management designed to balance all of the public needs and desires over the long-run provides the most public benefits including sustaining the natural infrastructure (clean air and water, carbon storage, wildlife values, etc.), fulfilling social requirements (recreation, tourism, aesthetics) and providing other socio-economic benefits that sustain humans (forest products, paper, energy, drinking water, support for local economies, etc.).

If the majority of forest in Massachusetts were set aside for aesthetics, recreation, and tourism purposes, there would be additional global consequences to forests outside of Massachusetts and the United States that are now being harvested due to our need for forest products. Many of these forests are very fragile and important to globally rare species vs. our temperate forest that have few globally rare species. It should be noted that the United States leads the world in the release of carbon per person and Massachusetts is one of the leading states. Sustainable forest management is designed to reasonably and responsibly participate in our present day solution to climate, energy, and economic challenges.

56. **Comment:** Were all small reserves selected by May of 2007? Is there a list? If not, how can we be sure that potential timber harvesting won't affect these potential sites? (respondent #12)

Response: Small-scale Forest Reserves were proposed prior to May 2007 according to the FRMP process. All FRMPs contain a list of State Forests where small-scale Forest Reserves are located and GIS generated maps indicating the locations of the Forest Reserves. Forest Reserves are officially designated when FRMPs are approved by the DCR Stewardship Council (for details see FRMPs at <http://www.mass.gov/dcr/stewardship/forestry/index.htm>). The public is always welcome to field review proposed and designated Forest Reserves

57. **Comment:** What if more than 20% of the land is found to be worthy of reserve designation? How are they selected? (respondent #12) Clarify how the appropriate mix of sustainable forestry and reserves is established in each district (respondent #31)

Response: During the four-year public process, evaluation criteria, guidelines and conceptual large- and small-scale Forest Reserves were extensively discussed at public meetings and during public comment periods. The Executive Office of Energy and Environmental Affairs (EEA) made a commitment to designate no more than approximately 20% of EEA agency forest lands as Forest Reserves. DCR has designated currently well over this percentage in the 4 Berkshire Districts FRMPs (~ 26% of all State Forest and reservations). The following selection criteria are designed to identify large and small-scale Forest Reserves in each of the district's resource area:

Old Growth
Valley Bottom Land
Protected Land in Surrounding Area
1830s Forest
Number of Viable Rare Communities
Forest Cover in Surrounding Land
Biomap Ambystomid Habitat
Riparian and Wetland Forest
Acreage of Largest Interior Forest
Forest Interior
Living Waters

An additional consideration regarding small-scale Forest Reserves was to include forest lands in the design that were intact and had poor or minimal access. An attempt was also made to consolidate small-scale Forest Reserves into larger blocks where possible.

58. **Comment:** Isn't DCR in non-compliance with Green Certification if these sites have not been chosen by May of 2007? (respondent #12)

Response: DCR has made considerable progress in the proposing and designation of a science-based Forest Reserve system and continually updates strategic plans to meet all of the Forest Stewardship Council conditions. While this process has taken longer than originally anticipated, FSC is aware of the progress DCR has made and the effort needed to complete all FSC conditions. These factors are a consideration during the determination by FSC auditors if DCR State Forests are in compliance with FSC conditions and are making sufficient progress toward those ends.

59. **Comment:** How do the reserves compare with nature preserves? Why do we only have one nature preserve? (respondent #12)

Response: Nature Preserves are designated by the Division of Fisheries and Wildlife within the Department of Fish and Game. Nature Preserves have strict guidelines for all activities and uses (including permits required for groups of 10 or more visitors). Forest Reserves meet biological needs and continue to allow socially important, although limited, activities and uses.

60. **Comment:** How can foresters rely upon the Natural Heritage database that is acknowledged by everyone to be incomplete? (respondent #12) Natural Heritage is under-staffed and under paid and is unable to stay current with the inventory of our lands so their database is incomplete (respondent #28)

Response: The Natural Heritage database is the best information currently available. As it is updated and improved, we are notified and use the newer data. The NHESP rare species database is dynamic and updated when new information is available. In addition, the Bureau has been conducting (through independent agreement), the survey and inventory of rare and uncommon species and vegetative communities in all active and proposed forest management projects. It should be noted that, dependent on time, these surveys are expanded to adjacent areas proposed for harvesting for the review of invasive species and an inventory of the observed common species to the area. Therefore, foresters can rely on NHESP along with data from the survey commissioned by the Bureau for the best available rare species information prior to implementation.

61. Comment: Why does the forestry program receive funding when it should be spent on improving the Heritage database? How can we protect species if we don't know where they are? (respondent #12)

Response: DCR's Management Forestry Program receives funding from the State's General Fund, capital, and retained revenue accounts. The Department of Fish and Game's Natural Heritage and Endangered Species program is allocated funding separately, as part of DFG's budget.

Supporting the rare species and natural communities program and effort is one of the Bureau's top priorities. Over the years, significant amounts of DCR funding have been applied to develop Rare Species Conservation Management Practices, High Conservation Value Forests, which include rare species habitat and natural communities, direct rare species and natural community searches, and ecological and biological planning professional services. The Bureau has taken all known steps to identify, use the most up-to-date protection measures, and protect rare species and their habitat and natural communities.

62. Comment: Who wrote in the Southern Berkshire Draft Plan that "DCR system lands have been managed over time with minimal written guidance ..."? Does everyone at DCR stand behind this statement? If this is the case, why bother getting Green Certification? (respondent #12) Resource Management Plans should be written by experts in many fields, not just foresters since they only know forests and will apply their limited view to all lands. What is their definition of "resource"? (respondent #28)

Response: DCR and DFG staff and specialists including professional ecologists, recreation specialists, archaeologists, "old growth" experts, foresters, park supervisors, and other DCR staff prepared the Southern Berkshire FRMP. In general, the above statement regarding lack of written guidance refers to the historical lack of consistent, system-wide written management plans throughout the DCR system. DCR's goal is to sustainably manage our public lands holistically. FRMPs include Forest Reserves, guidance for rare species and water quality management, and provisions for diverse wildlife values and recreation that is sustainable and does not impact our natural infrastructure are essential components.

Green Certification is not just about the completion of resource management plans. The plans are a small component of the FSC requirements to ensure that forest lands are well-managed and sustainable. FRMPs establish sustainable limitations on all resources and planning is based on a holistic understanding and integration of those resources of our State Forest lands.

63. Comment: The hope from Green Certification is that there would be better oversight of forestry practices. The respondent asks a series of questions having to do with some current controversial issues. The questions are (respondent #12):

- Are you aware of "mistakes" at Savoy Mt. and October Mt?
- Are you aware of an ongoing controversy in the Blandford-Chester (*sic*) SF?

- Are you aware that trees were marked for cutting along the eroding banks of the Westfield River in Robinson SP?
- Would you consider allowing local Conservation Commissions to have jurisdiction over forest practices in their local areas?
- What has DCR done to improve oversight of forestry at each logging site?

Response: DCR understands that there are a variety of viewpoints concerning past and present forest management efforts and philosophical differences on the role or need of forestry.

For example, some view treatment of Savoy Mountain and October Mountain as mistakes because clearcutting was performed. Others, including ecologists, environmental organizations, and the public view the same forest management activity as important ecological restoration of non native and dying Norway Spruce plantations monocultures to native, diverse and important northern hardwood early successional forests. These provide habitats that are presently lacking in the landscape and our high quality forests of the future.

DCR is aware of the Chester – Blandford SF public concerns. DCR is also aware that the red pine stand which had an under-story of northern hardwood went through the Forest Cutting Practices Act process and received approval due to non-native and off-site red pine plantation located along the edge of a beaver pond. This area had a predictive prognosis of high mortality (this is happening in an alarming rate across Massachusetts) and restoring our important watershed and aquatic resources to native species is a worthy ecological restoration goal. We are also aware that beaver reestablished this pond shortly after the project implementation occurred, cut the advanced northern hardwood regeneration and raised the level of the pond. We are also aware that this past summer a storm resulted in heavy rainfall and as a result the beaver dam was breached and the pond was drained, leaving evidence that it was once forested.

DCR is aware that there were a few trees marked for cutting on a recreational trail at Robinson State Park along the eroding bank of the Westfield River. The forester had intended to close and relocate the trail, which is significantly accelerating the erosion causing degradation of water quality and impacting important rare aquatic species. Some trees were marked for cutting that would be placed along some of the eroding banks as a means to stabilize the erosion, while others were marked to be used as barriers to close the trails. The Bureau was concerned about erosion and sought to reduce erosion through trail relocation, water barring and re-vegetation methods. While it is true that that a number of highly visible trees along the eroding trail were inappropriately marked, if implementation had occurred, many of the marked trees would have been unmarked, the trail would have been relocated to an acceptable location and the eroding trail restored with vegetation. These actions would have greatly reduced the level of sedimentation and minimized the erosion of the banks of the Westfield River. It should be further noted that since the time these trees were originally marked, at least one of them has fallen down due to the severe erosion along the recreation trail.

Current legislation and regulations place the administration of the Forest Cutting Practices Act under the authority of DCR's Bureau of Forestry, Service Forestry Program. Service Foresters undergo extensive training in aquatic, rare species, forest management, regulations, policy, etc. The working relationship and coordination between Conservation Commissions and DCR is very good.

The Bureau has prioritized filling the Service Forestry Program's organization positions as our first hiring priority. However, due to uncontrollable situations such as illnesses, injury, family leave and the Asian Longhorned Beetle infestation, there are competing needs and priorities. As vacancies arise, the filling of positions with highly qualified professional and experienced foresters is the highest priority. Extensive on-the-job and specialized training is conducted in all areas of forest

management with emphasis on aquatics, rare species and silviculture. An example is that the Chief Forester has submitted a grant proposal to the USDA-Forest Service for the continuing education of 200 MA, CT and RI public and professional foresters in ecology, silviculture and wildlife by leading scientists. The Bureau expends large financial resources in this area and has sometimes even received criticism that Bureau forester requirements are too stringent and unnecessarily restrictive.

64. Comment: Who made the decision to increase timber production on state land? (respondent #12)

Response: Over the last 105 years of managing the state forest, the amount of harvesting has fluctuated for a variety of reasons. For example during the 1980 to 1989 time period, the amount of harvesting was close to the present-day level, while from 1990 to 1999, much effort was spent conducting the Continuous Forest Inventory and the amount of harvesting was lower than in recent time. There are a number of interests including local town governments and the forest products industry who continue to criticize DCR for the low level of forest management that is occurring and the high level of current forest mortality.

65. Comment: Who made the decision to remove all red pine and Norway spruce plantations? (respondent #12)

Response: After conducting extensive resource assessments, analysis and review of current up-to-date ecological principles, one of the highest State Forest natural resource goals was established to restore non native and off-site plantations to native species. See comment #8 for the methodology used to address non-native plantations. Key factors in prioritizing plantation treatment were: plantations are non-native, off-site, and predominately monocultures; often overcrowded and therefore being more susceptible, and are dying at alarming rates across Massachusetts. Forest mortality is due largely to insect and disease problems and extreme wind events. Native vegetation provides high quality habitat for native Massachusetts species.

66. Comment: How can we demonstrate that trees cut on MA land are processed and used by state residents? (respondent #12)

Response: Local loggers do most of the harvesting on DCR lands. Not all trees cut on MA land are being processed and used solely by state residents. Current markets, local industry infrastructure, and Massachusetts business operating costs are factors that affect forest products being processed in Massachusetts. There are a number of trees being harvested in Massachusetts that are processed out-of-state and return to Massachusetts as a finished forest product. It is our hope that Massachusetts becomes a leader in global climate control measures that include a higher use of: forest products that replace higher carbon footprint products, locally sustainably produced products to reduce our carbon footprint, and conversion to renewable and local energy sources to reduce the use of fossil fuel.

67. Comment: Are there any laws that require DCR's timber to be used in state? (respondent #12)

Response: Not at the present time.

68. Comment: How much more money does FSC certified wood get? (respondent #12)

Response: An internet search on this shows that in general, FSC certified forest products is estimated to cost anywhere from 0 to 20% more than non-certified forest products at the present time. DCR has not tracked revenue fluctuation as a result of FSC certification nor is it possible to estimate a difference in revenue as a result of Massachusetts' FSC certification.

69. **Comment:** Has anyone done an analysis of how much more money consumers are willing to pay for this? (respondent #12)

Response: European markets for FSC certified forest products are well established. United States markets are generally dominated by products that are cheapest to the consumer. Therefore, many forest products in the United States are imported from afar. The greatest demand for FSC forest products is from pulp and paper due to corporations such as Time-Warner developing corporate policies to use “green” forest products. Also, many small-scale custom builders seek sources of certified forest products. We have had discussions with owners or procurement staff from sawmills and paper mills in New England who insist upon purchasing Green Certified forest products and have asked to be included on the notification list when timber sales are open for bidding.

70. **Comment:** Are these markets all in MA? (respondent #12)

Response: No, not all of these markets are in Massachusetts

71. **Comment:** Why is public land being used for the benefit of private industry? (respondent #12)

Response: Forest management is conducted for many reasons as stated in many of the above questions.

Timber harvesting on public land benefits all the users of forest products, not just private industry. The forest industry is a necessity to manage a forest. All of us use forest products every day and create a demand for them. Without an industry to harvest them and to deliver them to our markets, they would be unavailable to us. Using local forest products contributes toward reducing carbon release on a global basis, reduces destructive deforestation in areas of fragile soils and ecosystems, and protects the rarest of globally endangered species.

72. **Comment:** Did the citizens of MA vote to allow this? (respondent #12)

Response: State legislation supports forest management on state lands.

73. **Comment:** Do the citizens of MA support using public land to provide fuels for private new forms of energy? (respondent #12)

Response: Some citizens support using public lands to provide fuels for new forms of energy while others believe this is a poor decision. Many Massachusetts residents have taken action to install pellet stoves and wood burning systems for cost saving measures, to become independent from oil, or to use a renewable and climate friendly (non-fossil fuel) of energy. There is much discussion on continued reliance on foreign fuels, use of fossil fuels which are a major contributor to global climate change, exporting our country’s wealth to oil producing countries, and estimates by some that oil production has or is near to peak and that worldwide shortages are imminent.

74. **Comment:** When was the statewide public of MA consulted to see if they believe that timber harvesting is an appropriate use of their state public forests and parks? (respondent #13)

Response: A number of efforts have been made to seek public comment on harvesting as an appropriate use of state public forest and parks dating back to 1903 and as recently as 2004 when public meetings were held throughout the state.

75. Comment: How can the agencies act so brazenly in direct opposition to public opinion? (respondent #13)

Response: Some people believe that forest management is not an appropriate activity on public land. However, others believe that forests can be managed sustainably and responsibly for multiple benefits. Management of our forests will enable people to be better connected to these lands. Forest management will also result in improved conservation, protection of forests from development, reduction in greenhouse gases, use of sustainable local forest products, etc.

76. Comment: Who decided to start treating these public forests as industrial timber lands? (respondent #13)

Response: Public forests are not being treated as “industrial timber lands.” Industrial timberlands are driven by economic rotations that are very short with high revenue goals and little regard for aesthetics. By contrast, DCR forests are managed for much longer rotations and include many provisions and requirements to balance and protect all resources including rare species, aesthetics, water quality, native species, wildlife habitats, etc.

77. Comment: Using accepted silvicultural terminology is propaganda and Orwellian timberspeak for clearcutting (respondent #13)

Response: Silvicultural terminology is rigidly defined for professional foresters by the Society of American Foresters and silviculture textbooks. Licensed foresters are required to apply silviculture as it is taught and defined.

78. Comment: DCR is increasing their aggressive logging practices by using industry funded, think tank generated, focus group tested simplistic half-truths, distortions, omissions and outright lies to “help” wildlife for forest “health”, “biodiversity” and through greatly exaggerated threats such as wildfire, non-native, disease, etc. (respondent #13)

Response: There is no validity to these statements. Ecology, silviculture, and wildlife management is based on science that is well-documented.

79. Comment: Green Certification has meant a radical increase in logging rates on state land and is a “greenwashing” tool designed to justify this increase (respondent #13).

Response: This is not an accurate statement and it is an erroneous conclusion. The Forest Stewardship Council’s certification of forestry on all state lands is the result of a rigorous audit of practices and supporting documentation. As previously discussed, between 1980 and 1989 a similar amount of harvesting occurred as compared to recent times.

80. Comment: Green Certification by FSC is a direct conflict of interest since to de-certify a client would mean cutting their own paycheck (respondent #13).

Response: It would not appear that there is a conflict of interest because if certification auditors did not comply with the FSC standards, it would jeopardize the entire certification program. Massachusetts experience with Scientific Certification System, who audits for FSC, has been very thorough and SCS follows a rigorous list of criteria when evaluating DCR’s forestry program. As part of their annual audit, we are given a list of conditions that need to be corrected in order to be in

compliance with their standards. If we are unable to meet these conditions, we would not be granted Green Certification status.

81. **Comment:** The state is subsidizing cutting and burning the forest as a way to produce “green” electrical power in the form of biomass. Why doesn’t our supposed progressive Governor and his agencies know this? (respondent #13)

Response: There are no state programs that subsidize harvesting and burning forest products for bio-energy. Also, since very little biomass is currently coming from DCR land and there are few forest biomass electrical power systems in place, this statement is not true. As stated previously, the current level of harvesting in MA is well below the upper limit of sustainability.

82. **Comment:** The Governor has said that his ideas for energy and gasoline would not mean cutting trees in MA. Why is the Governor misleading the public on this issue? (respondent #13)

Response: DCR is not aware of these statements.

83. **Comment:** Since DCR is prohibited from clearcutting over 10 acres without strong justification, how can it do clearcuts that are 25 or 50 acres in size? (respondent #13)

Response: Clearcuts that are over 10 acres in size are rare and when justified are implemented to meet natural resource objectives. The number of present clearcuts over the last 20 years is less than 0.5% of the 285,000 acre land base and in general is limited to non-native plantations that had high levels of forest mortality or poor forest health conditions. Over the last 10 years less than a total of 1,000 acres of clearcutting (0.35% of the land base) has occurred within DCR State Forest and Parks primarily in non-native plantations in poor or deteriorating forest health, areas with severe wind or forest insect and disease damage, or to create early successional habitat.

84. **Comment:** MA should set aside 10% of its land in public parks and forest reserves (respondent #13) Is the stated goal of 20% of all DCR state park and forest land in Reserves a general description or an actual goal? (respondent #29)

Response: We are currently committed to setting aside the goal of more than 20% of our land for Forest Reserves. Western Connecticut Valley, and Northern and Southern Berkshire FRMPs designated 29%, 29% and 22.5% of their respective land bases as Forest Reserves.

85. **Comment:** MA should stop commercially logging its state forests and parks and obtain wood products from private forests (respondent #13). Consider protecting all DCR lands in the northeast from logging due to growing human populations (respondent #14). Bradley Palmer SF – should logging be done in this park since it sees such high recreation use? The state should measure park usage. (respondent #14). What is the purpose of timber harvesting (respondent #16).

Response: There are many reasons why forest management is important to continue in state forests and parks. The reasons range from dealing with forest mortality due to wind and insect and disease damage; restoring native vegetation; maintaining a diversity of tree species, vegetation types, age classes and structures; maintaining stocking levels at a level that can adapt to climate changes such as expected frequent and prolonged drought; reduction of Massachusetts’ carbon footprint; and economic reasons that effect the local economy and employment. DCR’s mission is one of multi-use, where resources, activities and uses are balanced and shared. Viewing the forest solely for recreation opportunities does not provide for the dynamics of forest vegetation and wildlife habitat needs. DCR

measures park usage and while the data collection system is not perfect, it is helpful and informative in managing properties and gauging anticipated future usage.

86. Comment: Was the Georgetown Rowley SF harvest inspected after the harvest? (respondent #14)

Response: Georgetown Rowley SF harvest was inspected after harvest and a number of monitoring reviews were conducted to bring this forest management project into better compliance with Bureau standards.

87. Comment: Is the Georgetown Rowley SF harvest site considered Green Certified quality? (respondent #14)

Response: Scientific Certification Systems, who conducts FSC certification audits, has not audited this harvest (sites are randomly selected). Bureau monitoring has resulted in additional clean-up of the landing (twice, with once as recently as the fall of 2008) to better comply with Bureau standards. Also, the Bureau found through internal monitoring that the harvesting yarding trail design did not meet its standards (too many harvesting yarding trails that run parallel to each other and the width in places could be reduced). The Bureau is planning on mandatory training on timber sale design to resolve these sale design and layout observations. The silvicultural systems designed and implemented were adequate. After harvesting, there is a stand of large diameter trees and a variety of desirable regeneration occupying the site.

88. Comment: Is there any actual profit for the state and towns when forestry occurs? What are the net figures (respondent #14) They cite a figure that for the last 5 years (2002 – 2006) the state only earned \$20.85 per tree.

Response: Including fiscal year 2008 and going back to 2002, the State saw the following revenues from timber harvesting:

Year	Total Revenue	In Kind Services	MA Revenue	Returns to Towns
2002	\$328,889	\$4,400	\$299,822	\$24,667
2003	\$1,108,096	\$57,140	\$977,409	\$73,547
2004	\$999,453	\$93,665	\$845,290	\$60,498
2005	\$1,349,507	\$87,736	\$1,174,278	\$87,493
2006	\$1,006,225	\$110,584	\$836,143	\$59,498
2007	\$936,912	\$122,177	\$762,638	\$52,097
2008	\$964,603	\$178,157	\$738,157	\$48,289
Total	\$6,693,685	\$653,859	\$5,633,737	\$406,089

The revenue for this time period totals \$6,693,685. According to our database, 262,175 trees were cut during this time period which averages \$25.53 per tree. This number includes all trees cut that are 4” diameter at breast height (dbh) and greater. Trees less than 10” dbh are considered non commercial. The revenue per commercial size tree is much greater than \$25.53 and probably closer to two or three times this amount.

89. Comment: Consider creating the state's first Vernal Pool Bioreserve at Boxford SF (respondent #14)

Response: DCR will consider all or portions of Boxford State Forest as a Forest Reserve. This consideration will include assessment of the short and long-term advantages and disadvantages of this type of designation.

90. Comment: Who will monitor the environmental impacts of harvesting, the same forester who was responsible for the Georgetown Rowley SF harvest? (respondent #14)

Response: DCR foresters that are responsible for prescribing and selling a timber sale must monitor the progress and activity. The Service Forestry Program monitors to ensure that the Forest Cutting Practices Act standards were followed. The DCR State Lands Management Program Supervisor, Service Forestry Program Supervisor, and Bureau Chief monitor all forest management and Service Forestry compliance with all laws and forest management standards. The FSC audit will conduct a sample annual audit for compliance with FSC standards. It should be noted that when non-compliance is observed, corrective actions range from remediation to training to improve the performance of the staff involved.

91. Comment: Will the increase in the construction of logging roads lead to more harvesting? (respondent #14)

Response: No, new DCR roads are planned and few if any are constructed for DCR timber sales. Harvest yarding trails are created when a timber harvest is sold and access is needed to complete the removal of the trees that are required to be cut and removed. The use of these yarding trails is temporary and does not necessarily lead to more harvesting. In general, harvesting roads, unless used for the recreational trail system, are not maintained and will re-vegetate over time.

92. Comment: Boxford SF – how will the stream that crosses the main trail in the red pine harvest area be protected (respondent #14)

Response: If harvesting occurs in the red pine plantation, all aquatic features will be protected according to the Wetland Protection Act through approved Massachusetts Forestry Best Management Practices. Streams are protected according to these standards.

93. Comment: How much of our logging contracts benefit out-of-state firms? If there isn't a local financial benefit or urgent forest health issue, what is the purpose of cutting in a state park? (respondent #14)

Response: Some of the harvesting on state lands is done by out of state companies. Timber harvesting in general benefits the state (from revenues), the town where the harvesting takes place (Forest Products Trust Fund return 8 or 50% of the sale value, depending upon the year that the land was purchased), and the DCR property itself benefits from in-kind services that are provided by the loggers (such as road and trail restoration, replacement of failing culverts, erosion control, and recreation improvements). In addition, managing the forest generally improves forest health and overall sustainability as well as providing forest resources to the public.

94. Comment: Why will logging take place in Bradley Palmer SP? (respondent #14)

Response: At this time, harvesting is not proposed at Bradley-Palmer SF.

95. Comment: The FS calculates that in 50 years, a tree generates \$31,250 in oxygen and \$62,000 in air pollution control yet the state earnings from forestry do not begin to compare to these values (respondent #14)

Response: Forests provide the natural infrastructure the respondent mentions in addition to water quality, wildlife habitat, carbon sequestration, etc. This is why it is so important to sustainably manage our forests that are in the temperate forest instead of securing forest products from rain forests, boreal forest, and other nations such as China and Russia. They do not manage their forests in a sustainable manner and therefore globally negatively impact rare species. Responsible and sustainable forest management for all resources and use is one of many necessary measures toward saving our planet for our children and future generations.

96. Comment: It is difficult to find the timber cutting plans on the DCR website (respondent #14)

Response: Forest cutting plans are not currently available on the DCR webpage. They can be requested through public information requests made to DCR Legal Counsel. We are hopeful that a web-based forest cutting plan system will be developed so that forest cutting plans can be easily viewed on-line. Proposed harvest summaries are posted for public comment on the DCR website and in the future we will attempt to improve the navigability to these summaries.

97. Comment: Better communication is needed to increase public participation in these proposed harvests (respondents #14, 16, 18)

Response: As stated earlier, we are making strides to increase the public participation through our website.

98. Comment: There should be at least 3 weeks of public notice before a public meeting (respondent #14)

Response: DCR holds two public meetings in each Management Forestry district each year which are always on the third Thursday of January and July, so the schedule has been established and announced for the future.

99. Comment: Do the taxpayers and clients of MA agencies want to see their parklands and state forests converted to biomass fuels? (respondents #14, 18)

Response: DCR is not aware of plans to convert state forest or parks to biomass fuel production areas. All timber harvests in state forests and parks are carefully planned for the sustainable management of all resources.

100. Comment: Harvesting our forest is an irresponsible move. Rare is the civilization that survives once it begins cutting down forests (respondent #15)

Response: European forests have been managed responsibly and sustainably for the benefit of their society for centuries. Since we are the greatest users of forest products and energy and contribute the most carbon to the atmosphere globally, we need to be leaders in the movement to reverse this trend. It is not responsible to harvest trees in the rain forest or in other countries that do not follow sustainable forest practices.

101. Comment: Do you believe that cutting down a forest will become anything less than a business proposition? (respondent #15)

Response: We, especially as citizens of the United States and Massachusetts, are responsible for the harvesting of trees and forests due to our continued high use of forest products. Also, forest products production is far less impacting than steel, plastics, and concrete which emits high levels of carbon during their production. We are managing the forest in a responsible and sustainable manner for a multitude of benefits including wildlife diversity, forest health, water, climate change, aesthetics, forest products, and renewable energy.

102. Comment: The proposed harvests should be explained in a letter to the editor in all local newspapers before the project can occur. (respondents #16, 22)

Response: DCR follows a Public Notification Policy for all proposed timber sales. While this policy does not include writing letters to newspaper editors, it does provide for significant public notification and opportunity for comment. The policy can be found at <http://www.mass.gov/dcr/stewardship/forestry>.

103. Comment: Many people in central MA carry a grudge against DCR based on past events (respondent #16)

Response: We are not aware of any “grudges” the citizens of central Massachusetts have against DCR.

104. Comment: What is being done to protect the forest and the creatures that live there? (respondent #16)

Response: The Bureau is appropriately managing for all species with emphasis on rare and uncommon species, their habitats and natural communities. Ongoing efforts include species searches at all proposed harvesting sites, development and implementation of Rare Species Conservation Management Plans, identification and proper management of High Conservation Value Forests and providing a variety of habitats and vegetative conditions across the landscape.

105. Comment: Supports timber harvesting to remove dead and dying trees (respondent #18)

Response: If our timber harvests only removed dead and dying trees, the State would have to pay to have this work done as these trees have little to no commercial value. Instead, by the sustainable harvesting of trees with forest products and energy value, the State and local towns earn revenue (see Response # 88 above), forest products are created and the overall biodiversity, health and vigor of the forest can be maintained.

106. Comment: Timber harvesting in MA lacks adequate research, oversight and management (respondents #18, 22)

Response: Massachusetts has an abundance of research, oversight, and management to conduct timber harvesting. Massachusetts has been managing the state forests since 1904. There is a wealth of past and on-going forest and ecological research that substantiates our forest management.

107. Comment: Thinning trees is preferable to clear cutting stands (respondent #18)

Response: In some situations, this is true. This depends on the site conditions, health of the forest and land management objectives. For example, a forest that has been infested by insects or disease or has had large amounts of blowdown may not have sufficient trees to conduct a thinning.

108. Comment: Soil erosion and aesthetics should be considered in all plans (respondent #18)

Response: Soil erosion is considered in all plans, especially when it comes to skid road design, stream crossings, sedimentation control, and water runoff design. We acknowledge that in some past projects, attention to aesthetics could have been better. DCR is committed to improvement in this area on all future projects.

109. Comment: Supports holding a public forestry forum with DCR Bureau staff and the Forest Stewardship Council (respondents #19, 31) and offers to help organize and publicize and other aspects of public outreach and input (respondent #31)

Response: DCR will be undertaking a statewide public process in 2009 to discuss forestry issues across Massachusetts, so thank you for your offer.

110. Comment: The trees in a proposed harvest should be marked so that the public can see the full implications and make informed comments (respondent #19)

Response: The trees are not marked until after the proposed harvest or until that point in time goes through this public comment period because these are only proposed sales before that. In some cases, areas may be flagged to demonstrate which trees are proposed for harvesting. The Bureau will be working on visual examples (before and after) for the public to view on our webpage.

111. Comment: Boxford SF –past logging still looks mowed down, even 2 or 4 years later. Maybe the use of less invasive equipment would help in the future (respondent #20)

Response: This suggestion will be assessed if the proposed project moves forward toward implementation, which is not anticipated until completion and approval of the Northeast FRMP (for more detail, please see <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

112. Comment: Boxford SF – only one of the two lots described have a size listed. There is no straightforward information on the largest of these two lots. (respondent #22)

Response: The Boxford State Forest Harvest Summaries will be updated to reflect the most current information including estimated acres.

113. Comment: Boxford SF – plant survey shows a high diversity of vascular plants and a nearly complete absence of invasive species as well as many native species that have become locally rare in eastern MA so any logging in this area could negatively effect this uniqueness. (respondent #22)

Response: If the harvesting moves forward, plant diversity will be protected and even enhanced where non native off-site, monocultures occur in the form of red pine plantations. All efforts will be made to continue maintaining the Boxford SF in native species without invasive species. (Note: as stated elsewhere in this document, please see DCR's timber harvesting policy for districts where FRMPs are not completed at <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

114. Comment: Even though Myles Standish SF isn't listed in any of the proposed timber harvests, it is being severely stressed by human activity. Would a timber sale solve the problem of illegal ATV use, camping and hunting? (respondent #23)

Response: Many state lands are stressed by human activity. A timber sale might not solve the problems cited but one of the positive benefits of having a timber sale is that we can often negotiate with the logger to perform in-kind services which can help to address some chronic problems that exist in the harvest area. There have been timber sales in Myles Standish SF where trees were effectively placed across ATV-ORV trails resulting in the unauthorized use being discontinued. Monitoring two years after this procedure was implemented, showed continued success at preventing illegal use of these trails. DCR has spent considerable effort dealing with this important issue and will continue to do so.

115. Comment: Boxford SF, Red Pine Middleton Rd 2009 – supports forest management in general but this project will result in a large amount of disturbance and limited benefit. The new logging road disturbance area exceeds the size of the harvest. (respondent #24)

Response: There are no new roads being planned for this timber sale. Reconstruction of the road will improve access including the fire department's ability to bring equipment into the forest to fight wildland fires and replace culverts that have failed which will allow water to flow more naturally. (Note: as stated elsewhere in this document, please see DCR's timber harvesting policy for districts where FRMPs are not completed at <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

116. Comment: The public needs an additional review period to comment on the proposed timber harvests (respondent #24)

Response: Additional public involvement is planned for the Boxford State Forest including winter and spring public field trips and evening meetings.

117. Comment: Shelterwood harvesting is the most inappropriate way to harvest trees in any MA forest and our state parks should never be harvested. (respondent #25)

Response: Shelterwood regeneration silvicultural systems are very effective methods of regeneration. This system is proven and does not result in high-graded forests.

118. Comment: Trees sequester carbon so they shouldn't be cut down. (respondent #25)

Response: Trees do sequester carbon. Trees also have a life span and a point where the amount of carbon being stored decreases as a result of old age, poor health or over-crowded forest conditions. Trees also release that stored carbon when they die, decompose or burn when there is a wildland fire event.. Trees that are retained or regenerate after a harvest are generally vigorous and sequester carbon. Forest products from harvested trees such as lumber and furniture also retain their sequestered carbon for long periods of time. Forest biomass used to replace fossil fuels has global climate benefits as far less carbon is released into the atmosphere. It is also far better to manage forest and harvest trees in Massachusetts from a global warming perspective instead of other areas in the world.

119. Comment: The 90 day stay on timber harvesting should be extended and study is needed (respondents #25, 26) Supports the 90 day pause in new timber cutting projects (respondent #30) Limit harvesting in areas without Forest Resource Management Plans (respondent #31)

Response: The 90-day pause has been extended, with limited exceptions, in the Eastern Connecticut Valley, Mid-State, Northeast and Southeast Forest Management Districts until their individual FRMPs are completed and approved. (Note: as stated elsewhere in this document, please see DCR's

timber harvesting policy for districts where FRMPs are not completed at <http://www.mass.gov/dcr/stewardship/forestry/index.htm>).

120. **Comment:** Forests with a past history of logging have less ability to sequester carbon dioxide than unlogged forests and biofuels have negative impacts and consume more energy than they generate. (respondent #26)

Response: We are proposing a system that sequesters carbon and provides sustainable forest products. As previously stated, transferring (global climate change concept of carbon sequestration leakage) harvesting and the supplying of our forest products from other parts of the world lead to far less carbon sequestration and increases in global climate. Bio-fuels derived from corn and other agricultural products do consume more energy than they generate. Cellulosic (forest based) bio-fuels produce far more energy than consumed in their development (see Timmons and Mejia who estimate it takes 1.25 gallons of diesel to produce a ton of wood chips for biomass or is approximately 2% of the wood chip gross energy potential).

121. **Comment:** Is angry that her timber harvest protest is not being acknowledged and that she has been deceived but happy to have this opportunity to have her voice heard. (respondent #28)

Response: It is important that all voices are heard and questions answered.

122. **Comment:** Feels that state forests are being managed for commercial timber production (respondent #28)

Response: DCR's goal is to manage the forest in a sustainable manner and the Bureau of Forestry is committed to fulfilling this goal. It is not accurate to describe our management style as commercial. A commercial solution would be far more impacting than the planned levels of harvesting at DCR forests.

123. **Comment:** The main purpose of Green Certification is to perpetuate sustainable commercial timber (respondent #28)

Response: There are ten principles and criteria for forest stewardship set by the Forest Stewardship Council (FSC). They guide the certification of forestry practices on Massachusetts lands. The principles can be seen at http://www.fscus.org/standards_criteria/. The main purpose is not to perpetuate sustainable commercial timber production but to sustain all resources and uses in a responsible ecological, social and economically viable manner.

124. **Comment:** Since nobody has ever been denied Green Certification, how tough can the standards be? (respondent #28)

Response: Those who apply for certification under the FSC principles and criteria understand the requirements and standards. Consideration of green certification is made after close examination of the organization's ability to meet the green certification conditions knowing there are costs to become and maintain certification status. The standards are stringent and difficult to achieve, which is the reason this program is necessary for effective state lands forest management. Several states have been audited and did not receive Green Certification for various reasons.

125. **Comment:** Massachusetts needs to reevaluate its participation in Green Certification (respondent #28) Enthusiastic support for the Green Certification designation (respondent #29)

Response: Massachusetts re-evaluated participation in the Green Certification program, taking into account feedback from the public, and has decided to continue this program. Many stakeholders support Green Certification, including the major environmental organizations in the State.

126. **Comment:** Commercial forestry is much more difficult in urban settings due to the invasive plants that will take over, suppress or eliminate the desired trees. (respondent #28)

Response: This is a major concern in an urban setting. Most of our foresters are licensed pesticide applicators so are able to deal with invasive species when they are aware that a problem exists. We also have a policy about spray washing harvesting equipment coming onto a site to try to prevent spread of invasive species.

127. **Comment:** What is the reward to the state for paying millions of dollars for Green Certification? (respondent #28)

Response: The cost for the 2002 green certification audit that included an initial certification for DSPR, DWSP, DFW, and University of Massachusetts forestlands and 4 annual audits was approximately \$120,000 and \$9,000 for the fall 2008 annual audit for DSPR, DWSP, and DFW forestlands. As a result of green certification, Massachusetts has invested in the forest's natural infrastructure by:

Delineating and approving Forest Reserves

Improving rare and uncommon species and vegetation communities protection and management

Improving forest management practices

Reducing erosion which maintains water quality

Inventorizing our roads and trails so they will be safe and environmentally sound

Marking boundaries to identify and reduce encroachments and trespasses

Preparing Forest Resource Management Plans for implementing and monitoring the sustainable management of our Commonwealth's forests

Planning and implementing a scientifically based long-term ecological monitoring program

All of the above accomplishments have public benefits. There is also a reward in the recognition, through an independent third party, that DCR forests are sustainably managed to provide a range of public benefits today and in the future.

128. **Comment:** The state could save millions by utilizing Friends Groups to volunteer their services and help when needed (respondent #28)

Response: This is potentially a very good idea. The challenge is to safely align volunteers with the skills needed to perform the services, train and monitor volunteers to meet DCR standards, and work

with labor unions to implement volunteer programs that are consistent with existing collective bargaining agreements.

129. Comment: Since the DCR has perpetually been under funded, the forest planning mandated by Green Certification has not been given the amount of attention as many members of the public believe it should (respondent #29)

Response: Forest Planning is a large undertaking and DCR is utilizing its resources to the fullest extent possible to implement this important priority.

130. Comment: These funding shortfalls have put undue pressure on the Forest Resource Management Plans to be comprehensive enough to cover other non-forestry goals such as recreation, aesthetics, and tourism (respondent #29)

Response: FRMPs address, in the context of the vegetation setting, recreation, aesthetics, and tourism. DCR Recreation, Planning, Operations, Regional and Park staff provide data, input, and considerations into the FRMPs.

131. Comment: DCR should recognize the recreational, aesthetic and spiritual or emotional value of many places and engage the public in a process to understand what the residents of MA value in their state forests and parks (respondent #29)

Response: We feel we have demonstrated a commitment to public dialogue through the many public meetings and discussions that have taken place to date, as well as future meetings that are scheduled. While we understand, recognize and are sensitive to the different and important values of the public regarding forests, we are looking forward to gaining more insights through the statewide public process planned for 2009. In developing the FRMPs, the Bureau has worked hard to recognize the recreational, aesthetic, spiritual and emotional values of state forests while also balancing the public's other values and uses of forests, such as supporting local economies and providing forest products.

132. Comment: Define "commercial" in the context of "no commercial forestry" in reserves (respondent #29)

Response: Forest Reserves will be managed primarily by natural process with the exception of non-native plantations and invasive species, and significant threats such as Asian Longhorned Beetle infestation, severe wind damage that increases wildland fire risks to unacceptable levels, etc. Harvesting operations may be one of the tools used to implement these exceptions.

DCR implements the principles of ecosystem management which is the balance of ecological, social, and economic considerations vs. commercial forestry where industrial forestlands objective is to maximize forest products and revenue.

133. Comment: Detailed inventories of DCR properties should be done as soon as possible (respondent #29)

Response: The forest lands within DCR properties have been inventoried (Continuous Forest Inventory) on a regular basis beginning in the late 1950's. This comprehensive inventory provides information on forest structure, species composition, age, diseases present, etc. In addition in 2003-2006, DCR conducted a forest typing effort to delineate forest stands and structure for FRMP planning purposes. In 2009, DCR is initiating the Continuous Forest Inventory which includes initiating data collection for the Long-term Ecological Monitoring program.

Also, administrative and recreational facilities, roads and trails have been inventoried as well as rare and uncommon species and their habitat and natural communities, invasive species, and common species when projects are planned.

134. Comment: The proposed timber harvests should include the relationship to the District plan and its goals (respondent #29)

Response: We are in agreement with this comment.

135. Comment: For proposed timber harvests in Reserves, the plan should include information about what problem is being addressed, how the plan will address it, and what alternatives were considered (respondent #29)

Response: This is a good suggestion. We are in agreement with this comment and will provide this information for any future timber harvests that may be proposed in forest reserves

136. Comment: How was the 105 year rotation figure determined? (respondent #29)

Response: The 105 year rotation was selected based on forest health, forest biology, aesthetics, activities and use conditions and considerations. The biological basis for selecting the 105 year rotation is that this is the “normally accepted” culmination point where the mean and average annual incremental (growth) cross and depart.

137. Comment: The district plans under review do not include maps (respondent #29)

Response: All FRMPs have maps posted on the forestry website at <http://www.mass.gov/dcr/stewardship/forestry/manage/index.htm>.

138. Comment: Supports the designation of High Conservation Value Forest (respondent #29)

Response: Maintenance of “High Conservation Value Forests” is Principle 9 of Forest Stewardship for FSC certification. DCR in coordination with the Division of Fish and Wildlife have developed a report outline the steps we intend to take to meet HCVF FSC principles. The report can be found on the DCR Forestry webpage at <http://www.mass.gov/dcr/stewardship/forestry/manage/index.htm>.

139. Comment: Committed to working with DCR staff and the Stewardship Council to address and resolve policy and planning questions regarding forestry on state lands (respondent #30)

Response: We appreciate your commitment to working with DCR and the Stewardship Council on these issues.

140. Comment: The 150 year trend of increasing forest cover in MA is being reversed by conversion of forest to other uses (respondent #31)

Response: There has been a 100 year trend of increasing forest cover in Massachusetts since the abandonment of agriculture (a successional land use – land cover change). Presently, there is a dramatic and long-term change in land use ongoing (change of forest to development). On DCR lands, this land use change is not occurring. Development on private forest lands coupled with climate change in the Commonwealth is the greatest environmental and ecological threat to our forests.

141. Comment: Vacant spots on the DCR Stewardship Council should be filled with representatives from the western and central portions of the state (respondent #31)

Response: This has occurred. Three new Stewardship Council members have recently been appointed and one vacancy is remaining.

142. Comment: Supports funding for DCR to complete the Forest Resource Management Plans and more comprehensive, site-specific RMPs (respondent #31)

Response: We agree.

143. Comment: Supports policy to gather public comments on individual Proposed Timber Harvest Summaries via their website but this is not sufficient to address all of the issues in the absence of consistent general forestry practices (respondent #31)

Response: As these comments indicate – most of the feedback we received were on general forestry practices, not on the individual proposed timber harvests. DCR looks forward to a broader, public dialogue through the statewide public process planned for 2009.

144. Comment: How is forestry integrated with other resource stewardship goals, recreation, scenic values and other interests (respondent #31)

Response: Forestry is integrated with other resource stewardship goals, such as recreation and aesthetic values, and other interests by taking care of these resources first through identification of their current and desired condition in the FRMP before forest management is considered.

145. Comment: Once the Forest Resource Management Plans are written and meet the necessary standards, they should be approved rapidly (respondent #31)

Response: We are in agreement with this comment and are pleased that four of the eight FRMPs have been completed and approved

146. Comment: Define and circulate for public review a strategy, plan and timeline for completing site specific Resource Management Plans (respondent #31)

Response: DCR is working on the development of Resource Management Planning public review, strategy, plan, and timeline.

147. Comment: Clarify the relationship between the FRMPs and the RMPs (respondent #31)

Response: FRMP is a Forest Resource Management Plan and RMP is a Resource Management Plan which includes the FRMP. RMPs start with an inventory and assessment of environmental, cultural and recreational resources, leading to guidelines for operations and land stewardship that are intended to ensure consistency between recreation, resource protection and sustainable forest management. The important information and recommendations related to sustainable forest management come directly from the FRMPs.

148. Comment: Complete site-level inventories of rare species habitats, rare natural communities, vernal pools, and other resources. Protect these resources by applying Heritage's CMPs to forestry activities and train all state foresters in their application (respondent #31)

Response: Currently DCR is completing all the above listed items.

149. Comment: Supports Green Certification as it supports a larger matrix of mixed use woodlands and has had many other positive results such as designation of reserves, forest type mapping, road and trail inventories, boundary marking, invasive species strategy and high conservation value forest protection (respondent #31)

Response: We agree with your observations.

150. Comment: Should post on the DCR website maps of large forest reserves approved by the Stewardship Council on September, 2006 (respondent #31)

Response: The Forest Reserves are posted the DCR forestry webpage for all four Berkshire FRMPs and on the EEA webpage. Forest reserves can be found on the DCR Forestry webpage located at <http://www.mass.gov/dcr/stewardship/forestry/manage/index.htm>.

151. Comment: Finalize the High Conservation Value Forest document once the Stewardship Council approves it (respondent #31)

Response: The High Conservation Value Forest report has been approved and the final report has been posted on the DCR Forestry webpage located at <http://www.mass.gov/dcr/stewardship/forestry/manage/index.htm>.

152. Comment: Release the proposed modifications to the Forest Cutting Practices Act for public comment and approval (respondent #31)

Response: DCR is working on the review and promulgation of the Forest Cutting Practices Act regulations, which will include opportunities for public input.

153. Comment: The potential loss of Green Certification jeopardizes a joint vision of forest reserves and sound implementation of the management principles that the rest of our forests require (respondent #31)

Response: Certification from the Forest Stewardship Council is a great asset to residents of the Commonwealth. We need to strive for continued FSC certification and will go through the recertification process in 2009.

154. Comment: Increasing logging rates (400% to 1200% increase historically) will result in a change in use of these resources that are held in public trust (respondent #32)

Response: As discussed in several responses above, these numbers are based on erroneous assumptions and unknown calculation methodologies. The continued management of Commonwealth forests as forest does not constitute a land use change. Forests will remain as forests. The current rate of harvesting compares well with the harvesting that occurred between 1980 and 1989.

155. Comment: The decision to allow more logging on state land was made by mid-management employees without a vote by the legislature or input from the public (respondent #32)

Response: There were numerous (9) public meeting concerning FRMPs and the level of management on state lands. This issue has been fully vetted with the public and in the presence of many elected officials or their representatives. Management and harvesting of forest products from state lands has been occurring for over 100 years. We understand that there are many viewpoints concerning the amount of forest management that should occur on state lands.

156. Comment: Is it suspicious that all of the proposed logging is for forest health reasons (respondent #32)

Response: Through prioritization, forest stands have been identified that have poor forest health conditions. Forest that are productive, comprised of diverse species composition and of varying age and structures leads to many ecological, social and economic benefits.

157. Comment: The Green Certification program has not served the public interest as it has lacked transparency and public involvement (respondent #32)

Response: Public involvement is an important direct part of FSC certification system process. The process and results are transparent as FSC's reports and annual audits are available for public review.

158. Comment: Harvesting is being conducted without proper monitoring and not in compliance with critical Certification principles (respondent #32)

Response: DCR Management Foresters or their assistants, Service Foresters, Program Supervisors, Chief Forester, FSC auditors, and the public conduct timber sale administration and oversight. When non-compliance issues arise, a number of courses of action are immediately implemented. It should be noted that circumstances involving non-compliance of contractors require some time to rectify.

159. Comment: The DCR Forest Stewardship Council was created by and represents the interests of the international commercial timber industry (respondent #32)

Response: This comment is not substantiated by the make-up of the DCR Stewardship Council. Information about the Stewardship Council and its members can be found at <http://www.mass.gov/dcr/stewardship>.

160. Comment: Taxpayer money is being used to inventory logging roads into state lands to facilitate additional tree harvesting.

Response: Roads and trails are inventoried and surveyed with public funds because some of them are not safe or environmentally sound due to erosion concerns. DCR does not have to conduct this work in order to perform tree harvesting. Road and trail inventories are needed for overall public access as well as management of state lands. Further, forest management is responsible for reconstructing and maintaining the majority of roads in a safe and environmentally sound condition for public access and recreational purposes. The Bureau is critically concerned about reducing erosion to improve water quality and to restore wildlife habitat by closing unnecessary and user created access to natural conditions.