Comments, Timber (DCR)

From: Miriam <[redacted]>
Sent: Wednesday, April 17, 2019 10:31 AM
To: Comments, Timber (DCR)
Subject: no to logging our state forests

To Whom it May Concern:
My husband and I treasure our state forests. Not only do we spend hours in them with our children, grandchildren, cousins and friends, but they have taught us all wonders about life on this planet. Logging harms the natural wonders for all its inhabitants. Each and every tree has vital importance to the life of the forests. Our state forests provide joy, warmth and education for thousands of people each year. We depend on the forests and all their wild beauty to keep a society that is self destructing, intact. Please, please, please let these very specials places remain for future generations and protect them from logging.

Thank you, Mike and Miriam Kurland Goshen, MA [redacted]

Comments, Timber (DCR)

From: KENNETH A <[redacted]>
Sent: Thursday, April 18, 2019 7:37 PM
To: Comments, Timber (DCR)
Subject: Western Mass timber harvests

I agree with the planned timber harvests in Western Mass. Actually, I think you may have waited a few years too long. Trees destined for death like our ash should be harvested before they are ruined by the horrible blight. Other mature trees should be responsibly harvested. The lumber from these trees can be used in durable and long-lasting items, sequestering their carbon as new trees take their place. Trees are a Natural Resource and our public woodlands, unless specifically protected as forever wild, should be managed for forest health and needed building materials.

Ken Egnaczak
[redacted]

Comments, Timber (DCR)

From: Josiah Bouricius [redacted]
Sent: Monday, April 22, 2019 3:46 PM
To: Comments, Timber (DCR)
Subject: Stop Logging Projects

To Whom It May Concern,

I am writing to express my opposition to the recently proposed logging projects on DCR land and logging on state lands in general. These projects would be detrimental to the environment and citizens both locally and globally.

I oppose virtually all logging on state lands especially since the public statements made by officials like DCR commissioner Roy which I have seen in support of such projects are at odds with clearly established science. My father is a biology professor who has studied forests for decades and we are both arborists. I am also a friend of climate scientist Bill Moomaw and others who support forest protection in our state for a variety of scientifically established reasons.

Thank you and have a great day,

Josiah Bouricius
Success Feng Shui
[redacted]

Comments, Timber (DCR)

From: Susan Spelman [redacted]
Sent: Friday, April 26, 2019 2:57 PM
To: Comments, Timber (DCR)
Subject: logging plans

Dear Sir,

I am distressed to read your plans to log over 500 acres of forest this summer for many reasons:

- Loss of habitat for thousands of animals that depend on mature forest to raise their young. Since we have already destroyed 83% of the wild animals already this kind of wholesale destruction is an example of a mindset that needs to be reconsidered. If you are not doing it for the money why would you destroy 86 acres of maple and sugar maples, birch and beech because of emerald ash borers? I understand infected trees, but not this collateral damage and destruction. Logging in the summer also kills many animals nesting in the trees.

-Cutting 90 year old Norway spruce trees just because they are non native and "might fall down " . In this age of climate change, I would hope you would be considering the amount of carbon tied up in those large trees before taking them down. Again, the mindset that destroying mature forest so that native trees can grow in 30 years or so years should be reconsidered. Before that all you will get is brush that will not support wildlife the way mature trees will. Climate change is real and you are only hastening it with your plans.

-Since they are public forests perhaps preserving them for public use would make more sense than forest management that focuses on commercial logging in our forests. Birding trails, hiking trails and camping are some examples of a forest use program that lets us enjoy the forests without damaging them. I am hoping you are not the agency that made such a scar on October Mountain with your forest management!

- The whole stated bible of " supplying timber products to the local economy", but then ship the logs out of state? Trees have much more value than their wood. Let's preserve our forest and leave them to help our climate issues instead of logging them to pay for foresters' salary. Maybe our forests don't need to be "managed" by cutting them down. An old growth forest is valuable, beautiful and home to many species that do not live in the aftermath of destructive logging, and much more pleasant to experience.

Sincerely,
Susan Spelman
[redacted]

April 29, 2019

Submitted via email to: Jessica Rowcroft jessica.rowcroft@state.ma.us

Jessica Rowcroft, Project Manager
Massachusetts Department of Conservation and Recreation
251 Causeway Street, Suite 700
Boston, MA 02114

RE: Comments on Seven DCR Proposed Forest Management Projects

Dear Ms. Rowcroft,

We are writing to comment on seven forest management projects that are being proposed by the Massachusetts Department of Conservation and Recreation (DCR) in seven state forests.[1] The projects include Brett Road (Beartown State Forest), Norway Spruce Removal I Pine Barrens Restoration (Myles Standish State Forest), Washington Mountain Norway Spruce Removal (October Mountain State Forest), Shear Pin Sale (Savoy State Forest), Hadley-Aiken - Partial Overstory Removal (Templeton State Forest), Barker Hill Lot (Townsend State Forest), and Two Cubs Timber Sale (Windsor State Forest).

DCR has issued an individual proposal for each logging project. These proposals include a number of claims regarding the benefits of logging, most of them presented in more than one project. The following cites the major claims made in the DCR proposals and our response to these claims.

We are concerned that these claims are either questionable or not supported by the facts. Therefore, we protest all seven of these logging projects.

Carbon Sequestration

DCR claim: Logging will "sequester carbon in retained overstory trees, permanent forest products produced from the harvest, and in the vigorous regenerating forest."

Response: DCR acknowledges scientific studies, which have found that uncut forests sequester more carbon than logged forests.[2] While any retained trees will, of course, sequester some carbon, the proposed logging project would result in significantly less carbon sequestration than if the forest were simply allowed to grow. This is especially important in Massachusetts, which has some of the most carbon-dense forests in the Northeastern United States that also have a large potential for future growth.[3]

Likewise, although some carbon may be sequestered in forest products, this would be far less than if the forest were left standing. Studies have shown that even considering conversion to

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[1] Department of Conservation and Recreation. 2019. DCR Announces Public Meetings for Forest
[2] Jared S. Nunery and William S. Keeton. 2010. Forest Carbon Storage in the Northeastern United States: Effects of Harvesting Frequency and Intensity Including Wood Products, Forest Ecology and Management, Volume 259, Issue 8, 31 March 2010. pp. 1363 1375)
http://www.uvm.edu/giee/pubpdfs/Nunery_2010_Forest_Ecology_and_Management.pdf
[3] P. Van Deusen and L.S. Heath. 2010. COLE Map Northeast. COLE Web Applications Suite. NCASI and USDA Forest Service, Northern Research Station. Available only on internet
http://www.ncasi2.org/COLE/maps/labCOLE_NorthCentral.png

wood products, most of the original carbon in a logged forest will be released to the atmosphere within a few weeks or months.[4]

Finally, while a young forest recovering from logging will sequester carbon, the amount will be less than if the existing trees were allowed to grow. Recent studies show that forests increase the rate of carbon sequestration as they age.[5] By cutting many, if not all, mature trees, the proposed logging projects would release massive amounts of carbon and set back the amount of new carbon sequestration for decades. Furthermore, logging can cause a gradual release of carbon from soils that lasts for decades after the logging is complete.[6]

The 2008 Massachusetts Global Warming Solutions Act (GWSA) called for dramatic reductions in greenhouse gas emissions beginning in 2020. The 2018 report of the UN Intergovernmental Panel on Climate Change (IPCC) warned that we need to dramatically address climate change by 2030, including not only reducing greenhouse gas emissions from energy production, but also absorbing and storing carbon from the atmosphere — with forests playing a critical role.[7] In 2019, Governor Baker reaffirmed a commitment with 24 other governors in the U.S. Climate Alliance to the goal of sequestering more carbon in forests as a way to mitigate climate change.[8] The logging projects considered here are inconsistent with this growing consensus.

"Sustainable" Production for the Local Economy

DCR claim: Logging will provide for "sustainable production" of "locally grown products for the locally grown forest products to the local economy."

Response: There is no agreed-upon scientific definition of "sustainable" forestry. DCR's own management guidelines state that, "Sustainable forest management [is an] evolving concept [which] has several definitions."[9] The contribution of this logging to the "local forest products industry" is highly dubious, since the agency acknowledges that more than 80% of logs cut on state lands are shipped out of state for processing. Moreover, timber values are so low that local towns receive only a few thousand dollars as their share of revenue from these sales.

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[4] John Talberth, Dominick DellaSala, and Erik Fernandez. 2015. Clearcutting our Carbon Accounts: How State and Private Forest Practices are Subverting Oregon's Climate Agenda. Center for Sustainable Economy and GEOS Institute. November 2015 http://sustainable-economy.org/wp-content/uploads/2015/11/Clearcutting-our-Carbon-Accounts-Final-11-16.pdf and Ann L. Ingerson. 2009. Wood Products and Carbon Storage: Can Increased Production Help Solve the Climate Crisis? The Wilderness Society, Washington, DC. https://www.sierraforestlegacy.org/Resources/Conservation/FireForestEcology/ThreatsForestHealth/Climate/CI-Ingerson-TWS2009.pdf

[5] N. L. Stephenson, A. J. Das, R. Condit, S. E. Russo et al. 2014. Rate of Tree Carbon Accumulation Increases Continuously with Tree Size. Nature: doi:10.1038/nature12914 (2014). http://www.nature.com/nature/journal/vaop/ncurrent/abs/nature12914.html

[6] Chelsea L. Petrenko and Andrew J. Friedland. 2014. Mineral Soil Carbon Pool Responses to Forest Clearing in Northeastern Hardwood Forests. GCB Bioenergy (2014), doi: 10.1111/gcbb.12221. http://onlinelibrary.wiley.com/doi/10.1111/gcbb.12221/abstract

[7] Intergovernmental Panel on Climate Change. 2018. Global Warming of 1.5° C: Summary for Policymakers https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf

[8] United States Climate Alliance. 2019. Natural and Working Lands https://www.usclimatealliance.org/nwlands

[9] Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines, p. 59 https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf

Liquidation of Plantations

***DCR Claim*:** Red pine and Norway spruce plantations need to be removed because they are "declining due to fungus, insects, disease, wind damage, or overcrowding, or are susceptible to these factors." This will also allow the "release" of native species in the understory and promote the restoration of native forest ecosystems.

Response: Most of the plantations targeted for logging are 80 years old or more. In many cases the plantations have been thinned by previous logging or through natural mortality. There is already an understory of native trees and herbaceous plants, which are gradually replacing the plantation trees as they die over time. Liquidation of plantations may speed up this process, but there is no evidence that it is necessary to ensure the eventual recovery of the native forest.

The goal is clearly to maximize commercial timber value by cutting down plantations to "salvage" the trees before they die. However, this comes at a major cost to the forest. Logging would cause major disturbance of forest ecosystems due to fragmentation of interior forest, scarification of soils, and degradation of water and air quality. Logging also can also increase susceptibility to invasive species, spread harmful insects and disease, and worsen the risk of fire.

Perhaps the greatest cost is that cutting down plantations will worsen climate change. As noted above, this will release most of the carbon in the trees, and a significant amount soil carbon, into the atmosphere. On the other hand, studies indicate that if these trees were left alone, even after they die they would continue to store most of their carbon for decades, releasing it slowly and gradually.[10] This is especially important because as the IPCC warns, minimizing carbon emissions over the next decade is critical if we are to avoid catastrophic climate change.

"Treatment" for Insects and Disease

DCR Claim: The logging proposals claim that cutting down trees is needed as a "treatment" for fungus, insect infestations, and disease. This includes the "salvage" of white ash "before its imminent mortality from the Emerald Ash Borer."

Response: Insects and disease are a natural part of healthy forest ecosystems. They help decompose and recycle nutrients, build soils, maintain genetic diversity within tree species, and provide homes and food for wildlife. There is little evidence to support the assumption by foresters that logging will reduce insects and disease.[11]

Emerging studies find that cutting down trees to "save" the forest from insects and disease actually makes the "problem" worse. For example, a biological analysis done by Acadia National Park, where logging is prohibited, found that logging elsewhere does not appear to

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[10] David J. P. Moore, Nicole A. Trahan, Phil Wilkes, et al. 2013. Persistent Reduced Ecosystem Respiration After Insect Disturbance in High Elevation Forests. Ecology Letters, (2013) 16: 731–737 doi: 10.1111/ele.12097 http://onlinelibrary.wiley.com/doi/10.1111/ele.12097/abstract

[11] Scott Hoffman Black. 2005. Logging to Control Insects: The Science and Myths Behind Managing Forest Insect "Pests." A Synthesis of Independently Reviewed Research. The Xerces Society for Invertebrate Conservation, Portland, OR https://www.xerces.org/wp-content/uploads/2008/10/logging_to_control_insects1.pdf

have prevented the spread of the red pine scale. Moreover, it was found that moving trimmed or harvested materials in spring through fall had the potential to actually spread the insect.[12]

There is also increasing evidence that logging reduces the natural resistance of a forest to insects and disease. In one study, researchers found that after "thinning" of forest plots, 50% of the trees' genetic diversity had been lost. Of particular concern was the loss of rare alleles, which plants and animals rely upon to deal with new challenges.[13] An annual inventory by the U.S. Forest Service found that, despite an outbreak of the emerald ash borer that killed most ash trees, some trees persisted, and offered options for breeding or reforestation.[14] "Salvaging" (cutting down) ash trees that have not been infected would cause the loss of trees that could potentially have resistant genes that could be critical in restoring the forest.

"Diversification" of Even-aged Forests

DCR Claim: Because "the harvest area is even aged, and is at a point in maturity appropriate to introducing a [sic] new age classes...logging will...increase biological and structural diversity." This will "improve wildlife habitat, specifically browse and cover through the introduction of new age classes and increasing species diversity."

Response: "Age class" is a forestry construct, not an ecological description. It derives from the timber industry approach of logging a stand of trees in intervals of several decades, leaving a forest made up of several "age classes." A natural forest has no "age classes," but is made up of trees in an age continuum from seedling to old growth.

Many of our state forest lands have "even-age" stands because of past logging using the industrial forestry approach. DCR would have us believe that more of the same will "increase biological and structural diversity." In fact, this will lead to a never-ending series of logging incursions every few years, which will perpetuate a forest with trees that abruptly jump in age several decades between them. This is not what a natural forest would do.

What DCR calls "improving" wildlife habitat, "specifically brows and cover," is called "forest fragmentation" by biologists. There is no objective evidence that creating more forest openings will "increase species diversity." In fact, the Massachusetts Division of Fisheries and Wildlife's BioMap2 report provides strong evidence that the opposite is true. This report states:

> "Forest interior habitat is widely recognized as critically important for species sensitive to forest fragmentation and is becoming increasingly scarce in highly populated regions of the country like Massachusetts.... Many bird species that breed in Massachusetts are sensitive to forest fragmentation, including Ovenbirds, Scarlet Tanagers, and many woodland warblers. Negative results of fragmentation include edge effects such as nest predation by

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[12] Acadia National Park. 2014. Invasive Insect Contributing to Red Pine Die-off on Mount Desert Island. National Park Service https://www.nps.gov/acad/learn/news/invasive-insect-contributing-to-red-pine-die-off-on-mount-desert-island.htm)

[13] Diana L. Six, Eric Biber, and Elisabeth Long. 2014. Review Management for Mountain Pine Beetle Outbreak Suppression: Does Relevant Science Support Current Policy? Forests 2014, 5, 103-133; doi:10.3390/f5010103 forestsISSN 1999-4907 https://www.researchgate.net/publication/259714120_Management_for_Mountain_Pine_Beetle_Outbreak_Suppression_Does_Relevant_Science_Support_Current_Policy

[14] Jennifer L. Koch, Mary E. Mason, David W. Carey, Kathleen Knight, Therese Poland, and Daniel A. Herms. 2010. Survey for Tolerance to Emerald Ash Borer within North American Ash Species in Proceedings of the Symposium on Ash in North America. U.S. Forest Service Forest Service, Northern Research Station. General Technical Report NRS-P-72 https://www.fs.fed.us/nrs/pubs/gtr/gtr_nrs-p-72r.pdf

species associated with development such as skunks, raccoons, and house cats; and nest parasitism by species such as the Brown-headed Cowbird that lay their eggs in the nests of other bird species and reduce their reproductive success. Forest interior habitats also support a wide range of native plants, animals, and ecological processes sensitive to other edge effects such as noise and light pollution from roads and development, invasive species establishment, and alterations to wind, heat, and other climate variables."[15]

If left alone, so-called "even-aged" forest tracts will evolve on their own to diverse, multi-aged forests. Efforts by foresters to "help" this process along will set back recovery and open the forest to invasive species, the spread of insects and disease, desiccation and increased fire risk, the and loss of interior forest wildlife. DCR's logging proposals fail to take these concerns into account.

Logging in Parklands and Reserves

DCR Claim: Logging is needed in areas designated as "Parkland" and "Reserve" to remove trees dying from insects and disease, to "release" understory trees, and to "remove hazards to infrastructure and human safety." Oak hardwood stands in the Parkland area "will also be treated with a commercial thinning system to remove stressed trees and to retain and promote high vigor trees. The primary goal of the treatment will be to promote a more diverse and complex forest structure of variable tree sizes."

Response: According to 2012 DCR Management Guidelines:

> Reserves" "conserve large contiguous blocks of high-value ecosystems.... Forest management will generally consist of letting natural processes take their course....
>
> Parklands conserve unique natural and cultural resources while focusing on the provision of recreation....[16]

These guidelines allow exceptions if it is determined that special circumstances require cutting of trees. However, the understanding from the DCR's Forest Futures Process, which led to these guidelines, was that there is a high burden of proof on DCR to log in Parklands and Reserves.

DCR is planning significant logging operations in the Parkland and Reserve areas of Beartown State Forest. However, DCR's claim that it needs to log for "hazards to infrastructure and human safety" are the same as those used for a logging proposal for Robinson State Park more than a decade ago. The proposed Robinson logging was supposedly to remove trees that were dying from insects and disease and to protect the public from trees falling along roadsides and buildings. The excuse then, as now with the Beartown proposed logging, was that it was too expensive to hire an arborist to selectively cut only hazard trees. Instead, DCR proposes industrial forestry operations that would include loggers with skidders and harvesters, which would cause significant damage to the forest and to public recreational use.

The Robinson State Park logging proposal met with massive public opposition. Citizen research showed that the rationales for the logging were not based on any objective science.

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[15] Natural Heritage Endangered Species Program. 2010. Forest Core BioMap2 Components. Core Habitat: Forest Core Critical Natural Landscape: NA. Massachusetts Division of Fisheries & Wildlife. http://www.mass.gov/eea/docs/dfg/nhesp/land-protection-and-management/forest-core.pdf

[16] Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf

After months of controversy, this ill-considered logging proposal was withdrawn. The proposal to log in Beartown State Forest Parkland and Reserve areas needs to be withdrawn and revised as a focused, low-impact project that carefully removes only trees that threaten public safety.

The proposed cutting of oak stands in the Beartown State Forest Parkland is even less justified. This would be nothing more than converting a natural forest into an industrial timberland. This natural forest does not need "treatment" to make it more diverse and complex. On the contrary, logging will simplify and degrade native ecosystems. There is no evidence that this logging operation meets the standards of DCR's guidelines, or that it is anything more than a commercial timber sale under the guise of "improving" the heath of the forest.

"Recruitment" of Sugar Maples

DCR Claim: Logging is needed to "increase the distribution and relative density of sugar maple to combat sugar maple decline." "Thinning will be used to remove other hardwoods...in small areas where no sugar maple are present, or...undesirable, openings of 1/3 acre or smaller will be installed in order to begin the process of regeneration, and hopefully recruit more sugar maple. [T]he desired future condition is for these stands to continue to be sugar maple dominant with a diverse groundcover."

Response: DCR acknowledges that, "Natural stands dominated by sugar maple are not common in Massachusetts." Yet, one of the goals of the Savoy State Forest logging project is to artificially create such sugar maple-dominated stands. This will be done by cutting down naturally occurring native tree species, such as white ash, red maple, yellow birch, white birch, American beech, and black cherry, and with small clearcuts to create forest openings.

There are at least four serious problems with this plan.

- Sugar maple decline is a generalized set of symptoms of trees suffering a wide range of different stressors and DCR provides no scientific evidence to show how this logging operation will address the issue.[17]
- Because this tract has apparently not been logged for decades, with trees that are 80 years old or more, the logging project would release significant amounts of carbon and set back carbon sequestration for decades in the future.
- This tract provides valuable interior forest habitat that would be fragmented by the creation of artificial openings.
- The DCR approach of logging forest where there are now no sugar maples with the goal of "hopefully recruiting" more sugar maples is highly questionable, considering the major downsides listed above.

"Restoration" Logging

DCR Claim: Logging is needed to "complete an ecological restoration of open pitch pine *(Pinus rigida)* and scrub oak *(Quercus ilicifolia)* communities, which are often referred to as

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[17] David R. Houston. 1999. History of Sugar Maple Decline un: Horsley, Stephen B.; Long, Robert P., eds. Sugar maple ecology and health: proceedings of an international symposium; 1998 June 2-4; Warren, PA. Gen. Tech. Rep. NE-261. Radnor, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station: 19-26. https://www.fs.usda.gov/treesearch/pubs/13134

'Pine Barrens'" in Myles Standish State Forest. "Humans have worked to "to exclude fire in these pine barrens areas over the past half-century" and "many plantations of exotic softwood trees were established on former pine barrens habitat or are adjacent to existing pine barrens. Therefore, "removal" of "non-native plantation[s]" which "are generally low in species diversity" "is a high priority."

Response: Myles Standish State Forest encompasses "globally rare natural communities, including the third largest Pine Barrens in the world, and numerous coastal plain ponds harboring unique plants and wildlife."[18] As with almost all of Massachusetts, this has been significantly altered by human resource exploitation. The goal of ensuring the recovery and protection of this important ecosystem is an important one.

We are concerned that the Myles Standish State Forest Norway Spruce Removal / Pine Barrens Restoration project would hinder, rather than promote ecological restoration. The plantation trees will gradually die and fall down, allowing native species to reclaim the landscape. Logging them only speeds up the process, and this comes at a serious cost. Cutting down plantations would release almost all of the carbon in the trees to the atmosphere, because the plan is to remove whole trees and chip them. This will worsen climate change. The disruption and radical alteration of this plantation liquidation would also increase the likelihood further invasive species incursions, insect infestations, and disease.

According to DCR, Myles Standish State Forest is "the largest public recreation area located in the densely populated southeastern Massachusetts," welcoming over 600,000 visitors per year.[19] DCR notes that, "as whole tree removal will occur, the resulting landscape will have a dramatic change in appearance as large clearings will be created." These "clearings" are otherwise known as clearcuts, and the public rightly finds such logging ugly and repellant. It would take many years for the clearcut areas to return to a relatively natural-appearing state.

The DCR logging proposal does not provide any site-specific information on what species of special concern require the cutting of plantations to survive or thrive. Detail is not available from the 2011 Resource Management Plan, which provides generic information across the entire landscape. This leaves us with no on-the-ground data showing scientifically proven benefits to specific rare or imperiled plants and wildlife on specific sites. Without this critical information, and knowing the likely negative impacts of logging, we oppose this project.

The rationales offered by DCR for these seven proposed logging projects raise serious questions and concerns. The agency has not provided scientific evidence to support any of its planned logging operations. Therefore, we protest all of the projects and urge DCR to withdraw them for further consideration and public review and comment.

We also object to the unreasonably short period for public comment on these logging proposals. The need to review and comment on seven individual logging projects is an undue burden for most citizens. This will severely limit the ability of most people to provide a detailed assessment and preclude many people from commenting at all. We urge DCR to extend the comment another 30 days to May 29, 2019.

Thank you for the opportunity to comment on these seven forest management projects. We look forward to your timely response.

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[18] Massachusetts Department of Conservation and Recreation. 2011. Myles Standish Planning Unit Resource Management Plan, Including Myles Standish State Forest. (p. i) http://www.friendsmssf.com/rmp/rmp-mssf.pdf

[19] Ibid.

Sincerely,

Michael Kellett
RESTORE: The North Woods
[redacted]

Janet Sinclair
[redacted]
Representing Concerned Citizens of
Franklin County
[redacted]

Mary S. Booth, PhD
Director, Partnership for Policy Integrity
[redacted]

Eleanor Tillinghast
Green Berkshires
[redacted]

Ray Weber
Friends of Robinson State Park
[redacted]

Adam Sacks, Executive Director
Biodiversity for a Livable Climate
[redacted]

Chris Matera
Massachusetts Forest Watch
[redacted]

Don Ogden
The Enviro Show
WXOJ-LP & WMCB
[redacted]

Eric Chivian M.D.
Founder and Former Director
Center for Health and the Global
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Harvard Medical School

Glen Ayers
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David J. Gafney
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Stephen Ryack
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Meg Sheehan, Esq.
[redacted]

Hazel Dawkins
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Miriam and Mike Kurland
[redacted]

Mary Gilbert
[redacted]

Dale LaBonte
[redacted]

Dave Roitman
[redacted]

Nan Finkenaur
[redacted]

Salvatore Raciti
[redacted]

Carissa Sinclair
[redacted]

Anna Zewinski
[redacted]

Michael Kurland
[redacted]

Josiah Camero-Renaud
[redacted]

Monica Jakuc Leverett
[redacted]

Mary Thomas
[redacted]

Don Wakoluk
New England Certified Soil Scientist and
MA Certified Arborist
[redacted]

Robert Cherdack
[redacted]

Hill, William (DCR)

From: Rowcroft, Jessica (DCR)
Sent: Tuesday, April 30, 2019 9:03 AM
To: David Gafney
Cc: Church, Peter (DCR); Hill, William (DCR)
Subject: RE: Beartown

Mr. Gafney,

Thank you for taking the time to provide comments on DCR forestry plans in Beartown State Forest – I am conveying them to the DCR Bureau of Forestry staff.

Jessica A. Rowcroft
Office of Cultural Resources
Department of Conservation & Recreation
251 Causeway St, Suite 600
Boston, MA 02114
ph: 617.626.1380
http://www.mass.gov/dcr/

From: David Gafney <housey303@gmail.com>
Sent: Monday, April 29, 2019 4:51 PM
To: Rowcroft, Jessica (DCR) <jessica.rowcroft@mass.gov>
Subject: Beartown

DCR's plans to log in Reserve and Parkland zones in Beartown State Forest is a betrayal of those of us that spent hundreds of hours and drove hundreds of miles to participate in the negotiations of the Forest Futures Visioning Process. The end result of which was the formation of three zones – commercial logging being prohibited in Reserve and Parkland zones. Was all that effort just a scam to mollify DCR critics – and now you will simply ignore the promises that were made at that time?

If you need to remove certain trees that pose a danger to buildings or roads in the Parkland Zone, DCF has arborist crews that can do that. It does not require the commercial logging of 112 acres in Beartown's Parkland and Reserve Zones. It does not require this blatant violation of the FFVP. Abide by the promises made and withdraw your plans for commercial Logging planned in Beartown State Forest Parkland and Reserve areas.

David Gafney
[redacted]
housey303@gmail.com

Comments, Timber (DCR)

From: [redacted]
Sent: Tuesday, April 30, 2019 10:49 AM
To: Comments, Timber (DCR)
Subject: Project Comments sent 4/29 but to wrong address-Pls accept

Please accept these comments that were sent to you yesterday on April 29, 2019 but sent to an incorrect email address by mistake. Thank you.

4/26/2019

Massachusetts Department of Conservation and Recreation
Bureau of Forest Fire Control and Forestry
740 South St.
Pittsfield, MA

Comments on Four Forest Management Proposals:
Shear Pin – Savoy Mountain State Forest
Two Cubs Timber, Windsor State Forest
Brett Road, Beartown State Forest
Washington Mountain Norway Spruce Removal

DCR Managers,

Below, please see my comments regarding the four proposed logging projects for Savoy Mountain State Forest, October Mountain State Forest, Windsor State Forest and Beartown State Forest. After attending the DCR hearing on April 2, 2019 that presented these projects, I find no compelling reason to cut these parcels. Although the foresters gave thorough presentations, I am not convinced that this logging would help our forests, and in fact, is probably detrimental.

As we have only 12 years to address climate change, we need to keep our forests intact and protect our mature trees from unnecessary cutting. Massachusetts has some of the most carbon-dense forests of New England and protecting them is a top priority. The DCR needs to refocus their efforts to addressing climate change and maximizing our forests' carbon sequestration.

Beyond the issue of preserving our forests as carbon sinks, I have a number of other areas that trouble me about these unnecessary projects:

1. The oversight by DCR on these logging projects seems to be inadequate. The disaster left from the recent Windsor State Forest cut where vernal pools were impacted highlights the problem. Are DCR foresters supervising contractors onsite during the entire logging process? It seemed from the 4/2/19 meeting that the only recourse to punish contractors for devastating a site was to not award them a contract the next time. That does not help the forests, recreation or the tax payer. There needs to be direct oversight.

2. I was alarmed by the DCR policy of removing ash trees that were infected with emerald ash borer and selling the wood to saw mills and even some was sold as fire wood! That policy clearly spreads the disease. There must be better ways of treating the trees onsite rather than spreading it beyond the forest.

3. The "managed forest policy" of cutting mature trees (50 years+) to create openings for younger trees to grow up is misguided. We need to be protecting our mature trees as they sequester more carbon the older they get. The concept that there will be a new replacement tree in 50 years does not help us in the short term fight against climate change.

4. I do not understand DCR's focus on selling timber. From what I can tell it does not make significant money for the state and, in fact, the tax payer may be subsidizing cutting our own forests and that makes no sense. DCR should be taking its focus off timber sales and directing it to maximizing carbon sequestration and recreation of our forests.

5. If any logging "needs" to be done, it should be done in the Woodland zones not in the the Reserves and Parkland areas.

In conclusion, I strongly oppose logging in these four parcels. DCR needs to refocus its department's efforts away from logging and retool it for the 21st century where we maximize our forests' sequestration and the public's outdoor recreation.

Respectfully,

Susan Purser
[redacted]
PO Box 612
Becket, MA 01223
goodkids@purser.org

Hill, William (DCR)

From: Rowcroft, Jessica (DCR)
Sent: Tuesday, April 30, 2019 9:01 AM
To: Robert Cherdack
Cc: Hill, William (DCR); Church, Peter (DCR)
Subject: RE: Logging Programs in Western Massachusetts

Mr. Cherdack,

Thank you for taking the time to provide comments on DCR logging programs – I am conveying them to the DCR Bureau of Forestry staff.

Jessica A. Rowcroft
Office of Cultural Resources
Department of Conservation & Recreation
251 Causeway St, Suite 600
Boston, MA 02114
ph: 617.626.1380
http://www.mass.gov/dcr/

From: Robert Cherdack <[redacted]>
Sent: Monday, April 29, 2019 4:43 PM
To: Rowcroft, Jessica (DCR) <jessica.rowcroft@mass.gov>
Subject: Logging Programs in Western Massachusetts

I have several comments on the plans to log on Western Massachusetts state forest lands. While the removal of Norway Spruce is merely unnecessary, most of the other cuts are harmful.

Cutting native hardwood because they are even aged is a poor excuse for logging public lands. Nature will take care of the even aged nature of the forest as different species and specimens within a species have very different life spans.

Opening the canopy invites invasive species. The most mature and deepest forests are the ones most free of oriental bittersweet and multiflora rose and other invasive vines and vine-like invaders. The very fact that you need to spray the new cleared areas with herbicides is strong evidence you should not be doing what you are planning.

Cutting ash trees while you can still get some money for them is a poor excuse for bringing loggers on to state land. The DCR foresters keep saying money is NOT the issue

Timber sales from state lands reduce the value of private timber lands.

Cutting timber reduces the gene pool and reduces the chance that strains resistant to pests or organisms that inhibit the pests will emerge.

The suggested sales seem to violate state guidelines for cutting on parkland and in reserves only when justified fro safety reasons. The cutting for road safety seem very extensive.

[redacted]

Comments, Timber (DCR)

From: Masino, Susan A. <Susan.Masino@trincoll.edu>
Sent: Monday, April 29, 2019 4:37 PM
To: Comments, Timber (DCR)
Subject: comments on 2019 forest plans

Dear DCR -

The majority of Massachusetts forests are owned privately. Our limited public land is for the public good, and is now urgently needed to address climate change, the biodiversity crisis and public health. These unfragmented rural areas are especially precious. DCR has cutting plans for hundreds of thousands of acres of private land under Chapter 61.

Please add these comments in their entirety to all of the proposed plans.

The 2019 proposed timber harvests do not reflect the latest science on carbon, biodiversity or public health. All of these values are significantly higher in a natural forest ecosystem compared to a managed forest. More than ever, rural areas – especially older forests, esp. those without invasive plants, should be left alone as intact corridors for carbon, biodiversity and migration.

The main goal seems to be removing trees that are part of a normal forest ecosystem. Bugs and dead trees are normal and not a reason for removal.

Can the public pay for the trees in a specific area? How would this be arranged?

What is the benefit vs. what is the cost of invading a rural forest? How can you ensure you are not bringing on or spreading invasive species?

The vast majority of the population does not live near a reserve - and even the reserves are not protected legally. Everyone in the Commonwealth should be able to grow up and enjoy a natural forest ecosystem. This is an issue of environmental justice and the only way to protect our natural and cultural history. How can DCR ensure this?

Why hasn't DCR reevaluated the reserve system, which was the plan when it was established – to expand reserves and establish new patch reserves?

Why are you logging in the reserves? How was this evaluated?

Which of these projects are core forest or impact wildlife corridors?

How do these projects overlap with the Nature Conservancies valuation of Tier 1 Matrix forest?

How much carbon are you release with this logging? Has DCR consulted with independent climate scientists?

Are there homesteads and historical features in these forests?

Why is there no representation from Western Massachusetts on the DCR stewardship council?

Respectfully submitted,

Susan A. Masino
Friends of Peru State Forest
Charles Bullard Fellow in Forest Research, Harvard Forest

southeastern massachusetts
pine barrens alliance
collaborative conservation initiatives

Date: April 29, 2019

To: William Hill, Management Forestry Program Supervisor, Bureau of Forest Fire Control and Forestry, Massachusetts Department of Conservation and Recreation (DCR)

Re: Comments regarding the Norway Spruce Removal/Pine Barrens Restoration, Myles Standish State Forest, Bare Hill Road

Dear Mr. Hill:

Thank you for the opportunity to comment on the DCR Bureau of Forest Fire Control and Forestry's proposal to restore land within the Myles Standish State Forest by the removal of two non-native Norway spruce plantations.

I applaud the Bureau's short-term objectives to increase both shrubland and pitch pine woodland that are expected to benefit pine barrens dependent plants and animals known to be in decline. I am also pleased to see that you are planning long-term active management of these two sites that include prescribed fire that should favor the growth of native plants and reduce the likelihood of non-native invasive species.

My one concern and wish is to see included in this proposal an indication that either the DCR or the NHESP will conduct biological surveys both before and after treatment—and at specific intervals in the future—to document what impact your efforts to restore shrubland and pitch pine oak forests will actually have on those species expected to benefit long term. Collecting quantifiable information for this project would generate useful and informative data as the forest ecosystem responds to management practices in the face of climate change. I would like to suggest that the DCR work with its partners to organize an "expert bioblitz." described as:

> An event where scientists and conservation practitioners come together to plan and execute rapid, field-based surveys that are designed to generate conservation-relevant data at a specific location, while simultaneously enhancing research capacity and building working partnerships focused on conservation. (https://blog.nature.org/science/2018/03/12/fast-cheap-and-collaborative-expert-bioblitzes-meet-conservation-needs/.

Bioblitzes provide information useful to land managers, utilizes volunteers, greatly reducing cost of surveys, and moves the public into greater awareness of local biodiversity and deeper appreciation of those agencies that care for public lands. Adding a bioblitz component would be a win for both the DCR and the public. I would like to offer SEMPBA's volunteer services to help The DCR organize a bioblitz for this project. Please contact me if you will consider this offer.

Sincerely,

Sharl Heller

Sharl Heller, President

CC: Karl Pastore
John Roberts
Paul Gregory

264 Long Pond Road, Plymouth, MA 02360
www.pinebarrensalliance.org