

FOREST MANAGEMENT PROJECT COMMENTS AND RESPONSES – Winter Proposals 2019

The Department of Conservation - Bureau of Forestry (DCR – BOF) requests comments about the specific proposals brought forth each year. The DCR – BOF considers all comments received and endeavors to respond to those comments whose focus is directed at the specific projects and the intent of the projects. Comments and questions that are general in nature are noted. Comments that are similar in theme are combined and summarized in the column below. All comments received can be found [here](#).

Individual or Organization	Public Comment Summary	BOF Response
Mike and Miriam Kurland, Josiah Bouricius, Susan Spelman, Robert Cherdack, Susan Massino	<p align="center"><u>All Proposed Projects</u></p> <p>Generally opposed to logging on all state properties but without specific issues with proposed projects.</p>	The DCR – BOF thanks the individuals for their comments. Logging as one tool for forest management on a portion of state lands was vetted and supported through the Forest Futures Visioning Process (FFVP) and the Landscape Designations and Guidelines (LD&G).
Ken Egnaczak	<p align="center"><u>All Proposed Projects</u></p> <p>Agrees with the well planned timber harvests in western Massachusetts but without specific comments to proposed projects.</p>	The DCR – BOF thanks the individual for his comment. Timber harvesting as one tool for forest management on a portion of state lands was vetted and supported through the FFVP and the LD&G.
Susan Spelman	<p>Questions:</p> <ul style="list-style-type: none"> • Destruction of 86 acres of maple and sugar maples • Cutting Norway spruce that will fall down 	<p>The individual’s comments are not directed at a specific project or projects but DCR – BOF assumes that the reference to destroying “86 acres of maples and sugar maples” and “Cutting 90 year old Norway spruce” refers to the Shear Pin Forest Management Proposal which totals 86 acres and includes stands of sugar maple and beech-birch-maple and 5 acres of Norway spruce.</p> <p>The forest management as proposed will regenerate the forest not destroy it. This activity will diversify the forest structure making it more resilient to future large scale disturbance. Harvesting of the non-native Norway spruce will utilize the trees in long term forest products while providing the growing space for native</p>

		trees to fully occupy the site affording a more diverse and resilient forest.
<p>Michael Kellett, Janet Sinclair, Mary Booth, Eleanor Tillingast, Ray Weber, Adam Sacks, Chris Matera, Dan Ogden, Eric Chivian, Glen Ayers, David Gafney, Stephen Ryack, Meg Sheehan, Hazel Dawkins, Miriam and Mike Kurland, Mary Gilbert, Dale LaBonte, Dave Roitman, Nan Finkenaur, Salvatore Raciti, Carissa Sinclair, Anne Zewinski, Michael Kurland, Josiah Camero-Renaud, Monica Leverett, Mary Thomas, Don Wakoluk, Robert Cherdack</p>	<p><u>All Proposed Projects</u> Objects to all projects because individuals believe that statements in proposal documents on the following topics are not supported by fact:</p> <ul style="list-style-type: none"> • Carbon Sequestration – Individuals comment that harvesting of wood products through the proposed forest management projects will have serious impacts to the carbon storage budget and thus hastening climate change. • Sustainable Production for the local economy – Individuals comment that they are dubious of the viability of the local forest economy and that timber values are so low that their contribution to local economies are minimal. • Liquidation of Plantations – Individuals disagree with establishing and enhancing native forest species through the harvesting of non-native and artificial plantations of red pine and Norway spruce. • Treatment for Insects and Disease – Disagree with DCR – BOF cutting trees infested or in imminent danger of being infested with insects or disease especially emerald ash borer claiming that insects and diseases are a natural part of forest ecosystems. 	<ul style="list-style-type: none"> • Carbon Sequestration – Forest management and carbon sequestration have been addressed by the DCR – BOF numerous times and can be viewed at these locations: 2018, 2017, and 2016 See also Managing our Forests for Carbon Benefits for further explanation of forest management and carbon storage. • Sustainable production for the local economy – The comments on this topic are general and not related to any of the specific proposed actions in the forest management proposals. The importance of continuing to foster and support a local forest economy was vetted and supported by the outcome of the FFVP and the LD&G Process. One of the most recent reports on the Massachusetts forest economy stated that the gross output in the forest products sector was over 3 billion dollars with over 17,000 jobs. • Liquidation of Plantations – The DCR – BOF has made it priority to manage for native forest conditions as they are more resilient to disturbance than a single species of trees planted in rows. The emphasis on native forests and native forest ecosystems through active forest management was brought forth in the FFVP and is emphasized

	<ul style="list-style-type: none"> • Diversification of Even Aged Forests – Disagrees that age class is an appropriate measure of forests stating that it is a forestry construct. Also disagrees that using management to diversify forest structure and age is appropriate. • Logging in Parklands and Reserves – Believes that the project proposed in Beartown State Forest does not follow DCR Management Guidelines and should be withdrawn. • Recruitment of sugar maples – Does not believe that the proposed approach of group selection in the sugar maple stand is appropriate to regenerate young sugar maple. • Restoration logging – Objects to the removal of Norway spruce plantations in Myles Standish State Forest because that will hinder ecological restoration, increase climate change, the public will object to the visual impact 	<p>throughout the LD&G and approved forest management plans. In appropriate areas such as Woodland designated properties this is a valid approach to managing the forest property. When there is a precipitous decline in the health of an existing plantation, its removal is prudent from a safety and an economic standpoint. The <u>gradual</u> conversion of non-native plantations to native species is more desirable and conducted in that fashion whenever possible.</p> <ul style="list-style-type: none"> • Treatment for Insects and Disease - In the face of <u>invasive</u> insect and disease species whose populations are exacerbated by a changing climate, it is not accurate to state that insects and diseases are a part of a natural ecosystem. Certainly native insects and diseases play an important role in our ecosystems but the forestry work proposed follows recommendations to control the spread of invasive pests. • Diversification of Even Aged Forests - Age class is not a forestry construct. It is a term used by any field or profession, including ecology that studies and describes population dynamics. Much of the forests of Massachusetts, and likewise the forests in the DCR land base are the results of agricultural land abandonment and subsequent forest succession and artificial
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		<p>plantation forests. Recent USDA Forest Inventory and Analysis statistics show that 82% of the forests in Massachusetts are in the very large size class and the DCR-Continuous Forest Inventory shows that 80% of DCR forests are in the age class of 70-110 years. Forests that are composed of a preponderance of a single size/age class are highly susceptible to mass loss from disturbance and it is appropriate to diversify that composition using forest management to protect against significant loss.</p> <ul style="list-style-type: none">• Logging in Parks and Reserves - The DCR – BOF extensively vetted the Brett Road project in Beartown State Forest internally prior to proposing it to the public. This included multiple meetings with the Forest Reserves Scientific Advisory Committee (FRSAC). Subsequent modifications were made to the proposal using the FRSAC consultation. The project proposal posted on March 15, in which the <u>only</u> Reserve areas included were roadside corridors with hazard trees, was supported as written by the FRSAC. The process worked as was recommended by the FFVP and specified by the LD&G whereby, with respects to Reserves "... if deemed appropriate by DCR and reviewed by the FRSAC, the following exceptions may be allowed: f) Removal of hazardous
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		<p>trees directly adjacent to official DCR trails and abutting properties that pose significant risk to public safety”.</p> <p>After further consideration of comments received and further evaluation of the proposed project, the DCR-BOF has also removed approximately 50 acres oak stands in Parkland designated area from the project located in the Arthur Wharton State Forest. It was deemed that this part of the proposed project did not pose a significant risk to public safety.</p> <p>The area immediately adjacent to the Beartown State Forest headquarters in the Parkland designated area has been determined by the DCR - BOF Forest Health Program and Operations staff to contain excessive hazardous trees that pose as significant risk to public safety and can be more effectively removed by a “forestry firm”.</p> <ul style="list-style-type: none">• Recruitment of sugar maples – The sugar maple dominated stand in which this proposed activity is to take place is lacking sugar maple regeneration due to competition from other tree species. The 1/3 acre openings to be created for seedling establishment are minimal on a landscape scale, mimicking light
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		<p>natural disturbance and will provide the conditions appropriate for sugar maple seedlings giving them a competitive advantage.</p> <ul style="list-style-type: none"> • Restoration logging – Numerous locations in southeastern MA, interior MA, southern NH and eastern NY on public, NGO and private lands have used forest management including logging and prescribed fire to rehabilitate pine-barrens habitat. Work of this type was completed in 2015 by the DCR – BOF in Myles Standish State Forest when nearly 500 acres of red pine was harvested from the property and there was no opposition to the activity or the results.
<p>David Gafney, Robert Cherdack, Susan Massino</p>	<p><u>Brett Road – Beartown State Forest</u></p> <p>Questions or objects to proposed logging in Beartown State Forest Parkland and / or Reserve designated properties. Believes (Gafney) that the proposal is a betrayal of the public process that took place in the FFVP.</p>	<p>The DCR – BOF extensively vetted the Brett Road project in Beartown State Forest internally prior to proposing it to the public. This included multiple meetings with the Forest Reserves Scientific Advisory Committee (FRSAC). Subsequent modifications were made to the proposal using the FRSAC consultation. The project proposal posted on March 15, in which the only Reserve areas included were roadside corridors with hazard trees, was supported as written by the FRSAC. The process worked as was recommended by the FFVP and specified by the LD&G whereby, with respects to Reserves “... if deemed appropriate by DCR and reviewed by the FRSAC, the following exceptions may be allowed: f) Removal of hazardous trees directly adjacent to</p>

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<p>Susan Pursar</p>	<p><u>Shear Pin – Savoy Mountain State Forest, Two Cubs – Windsor State Forest, Brett Road – Beartown State Forest, Washington Mountain Spruce, October Mountain State Forest</u></p> <p>Generally opposed to logging on these properties and objects to forest management in general but without specific issues with proposed projects <u>except</u> to note concern with the focus on utilizing ash infested with emerald ash borer.</p>	<p>The DCR – BOF thanks the individuals for their comments. Logging as one tool for forest management on a portion of state lands was vetted and supported through the Forest Futures Visioning Process (FFVP) and the Landscape Designations and Guidelines (LD&G).</p> <p>The DCR – BOF follows all federal and state guidelines and regulations with respect to cutting and transportation of ash forest products that have been or can be infested with emerald ash borer.</p>
<p>Sharl Heller – Southeastern Massachusetts Pine</p>	<p><u>Norway Spruce Removal / Pine Barrens Restoration - Myles Standish State Forest</u></p>	<p>The DCR – BOF is appreciative of the support of this important forest management work to rehabilitate and restore pine barrens habitat.</p>

<p>Barrens Alliance (SEMPBA)</p>	<p>In favor of this proposal that is intended to increase the pine barrens habitat. Additionally pleased to see that long term plans are to use prescribed fire to maintain the pine barrens habitat.</p> <p>Concerned that there should be biological surveys before and after the treatment to monitor the responses to management. Suggests an “expert-bioblitz” and offers assistance from SEMPBA volunteers to help in the surveys</p>	<p>DCR – BOF is also grateful for the suggestion of the bioblitz and the offer to help conduct biological surveys. The DCR – BOF’s current protocol is to conduct a pre-treatment inventory that collects information on the overstory and understory plants. It is also our protocol to follow with a post management monitoring inventory approximately 5 years after the harvest or prescribed fire. We will give serious consideration to involving SEMPBA in those surveys.</p>
<p>Susan Massino – Friends of Peru State Forest</p>	<p style="text-align: center;"><u>All Proposed Projects</u></p> <p>Many general statements and questions not specifically related to the proposed projects to which a response can be seen noted above.</p> <p>Offers that the proposed projects do not reflect the latest science on carbon, biodiversity or public health.</p> <p>Questions on ensuring the projects activities do not spread invasive plants; their impact on wildlife habitat, carbon release, and implied impacts on archeological features.</p>	<p>In fact the DCR – BOF Management Forestry program, and thus the proposed projects, does consider recent science and data on all of these topics. The DCR – BOF has spoken numerous times on the balanced approach to carbon stock management that is supported scientifically – see responses above; the DCR – BOF submits that there is a significant breadth of science that supports that biodiversity can be maintained and enhanced through properly applied sustainable forestry practices; positive public health and forests have a strong correlation in current science that includes recognizing first that maintaining forests as forests is expressly vital and that sustainable forest management practiced for the benefit of society’s needs for recreation, water, wildlife, and wood products is a part of that strategy.</p> <p>The DCR – BOF requires that all equipment be washed of debris before entering DCR land and then subsequently inspected and given approval. DCR – BOF conducts a monitoring program following forestry activities checking for invasive</p>

		<p>plant species. All forestry projects are vetted with the DCR Upland Ecologist, and MassWildlife for their impact on the local wildlife habitat value. DCR-BOF does not estimate the carbon release on an individual forestry project but does consider the carbon impacts of active forest management as well as reserved lands across the landscape of DCR lands – note responses above. Each forestry project is reviewed by the DCR Archeologist and further inventoried for historical features during the planning stages of the project.</p>
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