**Comment Number 1**

Thu 10/27/2022 9:08 AM

We are asking that management projects proposed this year be limited to activities allowed in the “Reserve” areas (relatively unimpeded by human disturbance), and that these state forests become designated as "Reserves" as soon as possible.

Thank you,

Joanna A. Kent

LD/Wilson Dyslexia Therapist

IDA/CERI Dyslexia Specialist

**Comment Number 2**

Thu 10/27/2022 10:13 AM

We are asking that management projects proposed this year be limited to activities allowed in the “Reserve” areas (relatively unimpeded by human disturbance), and that these state forests become designated as "Reserves" as soon as possible.

Laura MacLeod, family, and friends

Amherst, MA

**Comment Number 3**

Fri 10/28/2022 7:33 PM

Hello, my name is Tom Hoffman, and I am on the Town of Washington Historic Commission. I attended a presentation on the 24th of October at the Washington Selectmans meeting, regarding a logging operation in town.

  I have a concern about 5 cellar holes from the mid 1800's, that appear to be in the cut zone. There is also an abandoned section of an historic 1804 road, that is in the zone. Kris Masssini has asked me to send him a map with gps coordinates, of the foundations and the road.

  I would ask that the foundations and the road are not disturbed by skidder traffic, or the holes filled with slash.  Beyond that,  the best of luck with the project! Thank you!

Thomas Hoffman

2 Old Middlefield Rd,

Washington, MA 01223

413 212 6039

**Comment Number 4**

Sat 10/29/2022 6:55 AM

DCR “Reserves” need to be redefined. As they stand, now too many exceptions for invasive logging are allowed making a mockery of the concept of putting aside forests for natural carbon capture.

Management projects proposed this year should be limited to activities allowed in redefined “Reserve” areas and these state forests should become designated as redefined "Reserves" removed from logging operations.

Don Ogden

The Enviro Show

WXOJ/WMCB/WMNB

140 Pine Street

Florence, MA 01062

**Comment Number 5**

TO: Massachusetts Department of Conservation and Recreation

RE: Comments on DCR Forest Management Projects Proposed for 2022

DA: October 28, 2022

We write to submit our comments on the proposed Department of Conservation and Recreation (DCR) forest management projects in ten state forests: October Mountain, Bryant/Berkshire Snow Basin, Warwick, Savoy Mountain, Otis, Sandisfield, Dubuque, Myles Standish, Manuel Correllus, and Townsend. (<https://www.mass.gov/guides/forest-management-projects#-forest-management-projects-proposed-2022->)

We object to cutting in our state forests for the purposes of: a) carbon capture and storage, b) treatment for insects and disease, c) fire prevention, d) ecosystem restoration, e) liquidation of plantations, f) improvement of wildlife habitat, g) improvement of recreational experiences, h) sustainable wood products, i) diversification of even-aged forests, and j) forest restoration. We note that these goals of DCR are included in one or more of the 2022 proposed projects.

On the other hand, DCR’s 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines includes guidelines for Reserves that are generally reasonable and offer protection and management that is more in line with public sentiment and independent scientific research. This includes oversight provided by the Forest Reserves Scientific Advisory Council (FRSAC), consisting of conservation biologists and forest ecology experts, to assist and review management and major restoration activities within Reserves. Those guidelines define and outline management actions allowed in Reserves, per the excerpts below. (<https://archives.lib.state.ma.us/bitstream/handle/2452/200210/ocn816519530.pdf>):

2.1  Reserves – Purpose [p. 15]

The primary purpose of setting aside large areas of forest as Reserves is to allow forests to develop relatively unimpeded by human disturbance and to create late successional habitat. Given a sufficient amount of time without major disturbances, the forest will develop characteristics associated with true old growth forest. These late successional and old growth conditions include a wide diversity of tree sizes and ages, tip‐up mound topography, and micro‐site conditions from fallen trees and large amounts of downed woody debris….

2.3  Management Approach for Reserves [p. 16-17]

The dominant ecosystem service objectives in Reserves will be:

• biodiversity expansion, including complex forest systems

• carbon sequestration

• provision of wilderness recreation opportunities

Management of Reserves should allow natural processes to determine the long‐term structure, composition, function and dynamics of the forest to the maximum extent possible.

[Management Priorities in Reserves] [p. 3-4]

Reserves will conserve large contiguous blocks of high‐value ecosystems…. There will be no commercial harvesting of timber in Reserves.

Silviculture and Vegetation Management Guidelines: [p. 22]

A. Habitat manipulation, silvicultural treatments and commercial harvesting operations are not permitted in Reserves. However, if deemed appropriate by DCR and reviewed by the FRSAC, the following exceptions may be allowed:

a) Implementation of NHESP recommendations to restore, maintain or enhance habitat for rare and endangered species and exemplary natural or rare communities.

b) Removing plantations would not be permitted except to restore important wildlife habitat such as pitch pine barrens or other habitats and after consultation with DFW and FRSAC.

c) Removing non‐native invasive species may occur after consultation with FRSAC.

d) Managing vegetation to control erosion, or to stabilize soils.

e) Cutting of vegetation to maintain established public vistas and trails is permitted (e.g., the small Spruce Mountain vista located in Monroe State Forest).

f) Removal of hazardous trees directly adjacent to official DCR trails and abutting properties that pose significant risk to public safety.

g) Vegetation management is permitted by parties who have secured pre‐existing rights (e.g., easement holders, utility easements) to perform such activity, subject, however, to standard regulatory and permitting requirements.

h) Cutting vegetation to maintain existing agricultural fields or existing wildlife habitat openings is permitted.

B. Creation of new fields, vistas and wildlife openings is prohibited.

We request that all of the 2022 DCR Forest Management proposals be limited to activities allowed in Reserves, under the review and guidance of the FRSAC, as specified in the 2012 DCR Selection Criteria and Management Guidelines (cited above).

We also request that DCR designate all of the lands encompassed by these management proposals as new Reserves as soon as possible.

In addition, we request that the public remain informed and engaged in management proposals on all DCR properties.

Thank you for the opportunity to comment on these forest management proposals.

Sincerely,

Kate O’Connor and Frederick Spence,

North Rd

Westhampton, MA

**Comment Number 6**

Mon 10/31/2022 7:49 AM

To Whom It May Concern:

These comments are intended for all of the Forest Management Projects Proposed for 2022 by the Department of Conservation and Recreation. I completely oppose the implementation of these projects. Continuing with these projects will increase carbon in the atmosphere for many decades at a minimum and the management activities are a waste of taxpayer money. Western Massachusetts, the site of most of these proposals, has many more pressing needs other than forest "management," such as paving our public dirt roads (which would reduce fuel consumption and atmospheric carbon).  Forests will grow on their own without human intervention. All Massachusetts state forest lands should be designated "Reserves" permanently.

Sincerely,

Karl Dziura

2 Hidden Ledge Drive

Conway, MA

**Comment Number 7**

Tue 11/1/2022 8:31 AM

Thank you for allowing Ruffed Grouse Society to submit comments on the Massachusetts DCR Forest Management Program proposals. Please see our comments attached. We strongly support DCR’s efforts to promote sustainable forestry and landscape-level management across the Commonwealth.

Regards,

Todd Waldron

Northeast Forest Conservation Director

Ruffed Grouse Society | American Woodcock Society

**Comment Number 8**

October 24, 2022 Peter Church Director,

Forest Stewardship DCR Bureau of Forest Fire Control and Forestry

251 Causeway Street Suite 900 Boston, MA 02114

Re: Massachusetts DCR Public Comments on Forest Management Programs 2022 proposals in Washington, Cummington, Warwick, Savoy, Otis, Sandisfield, Townsend, Carver, and Edgartown.

To Director Church,

Thank you for offering Ruffed Grouse Society & American Woodcock Society the opportunity to comment on Massachusetts’ DCR proposal for upcoming state forest management programs across nine towns in the Commonwealth, as outlined in your virtual public meetings on October 18 & 20, 2022. Established in 1961, the Ruffed Grouse Society (RGS) is North America’s foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with the American Woodcock Society (established in 2014), RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

RGS & AWS strongly supports DCR’s forestry program recommendations, and we applaud the agency’s efforts to advance sustainable forest management across the Commonwealth. The Massachusetts 2020 Forest Action Plan (link here) identifies 10 broad goals for Massachusetts’ forests, including “increasing resistance and resilience of trees and forests to mitigate and adapt to the effects of climate change, and managing for forest ecosystem health and biodiversity”. There are 570 Species of Greatest Conservation Need in the Massachusetts State Wildlife Action Plan and the loss of habitat and forest age class diversity is one of the leading factors https://www.mass.gov/service-details/state-wildlife-action-plan-swap. This issue is attributed in large part to wide-ranging habitat decline and a lack of forest habitat diversity. The forestry programs that are being proposed will help address these challenges

.

Balanced, resilient forests provide whole ecosystem benefits, including clean air & water, recreation, open space, and abundant wildlife habitat. There is a link between forest age class diversity loss and wildlife declines. Forest habitat diversity was historically maintained by natural disturbances - which have largely been suppressed in New England for over a century. Sustainable forestry emulates natural forest Ruffed Grouse Society & American Woodcock Society 451 McCormick Road, Coraopolis, PA 15108 (412) 262-4044 -- Toll Free (888) 564-6747 RuffedGrouseSociety.org 2 disturbances to create a much-needed balance of tree ages, species, and habitat types that are good for wildlife and ecosystem resiliency.

Additionally, the proposed DCR forest management programs are consistent with the ten forest climate adaptation strategies recommended by Swantson et al (2016) Forest Adaptation Resources: climate change tools and approaches for land managers, 2nd edition (Northern Research Station General Technical Report NRS-87-2) which include for example sustaining fundamental ecological functions, reducing the impact of biological stressors, maintain and enhance species structural diversity, promote landscape connectivity, and increase ecosystem redundancy across the landscape.

A concerted effort is needed to ensure resilient, climate-adapted, diverse forest landscapes throughout Massachusetts. Sustainable forest management is entirely compatible with climate solutions and services like mitigation, adaptation, and biodiversity. We applaud DCR’s efforts to incorporate sustainable forestry and wildlife friendly silvicultural practices into your planning frameworks.

Respectfully, Todd H. Waldron

**Comment Number 9**

Tue 11/1/2022 8:37 AM

To Whom It May Concern,

On behalf of the Massachusetts State Chapter of the National Wild Turkey Federation, please see attached letter of support for the proposed forestry projects.

Regards,

Matt DiBona

Dear Mr. Brule, On behalf of the Massachusetts State Chapter of the National Wild Turkey Federation (NWTF-MA) and our more than 1,000 members in MA, we would like to express our support for the public land forestry projects proposed by the Department of Conservation and Recreation (DCR).

Massachusetts’ forests need active management to help diversify the age, composition, and structure of our public forestlands. Well-managed forests improve overall forest health and climate resiliency. We believe the proposed projects will achieve multiple benefits, from addressing ash stands affected by Emerald Ash Borer to improving the health of oak and spruce/fir stands to assist with climate adaptation. In addition, we believe that many of the proposed silvicultural practices will have positive benefits for wildlife. A lack of early-successional habitat has been identified as a conservation issue in New England, and is a leading factor behind the decline of many Species of Greatest Conservation Need in the state. The proposed thinning and regeneration cuts will create much needed young forest habitat and increase understory structure. A broad suite of game species, from wild turkeys to grouse and deer, will also benefit from the proposed management activities. In turn, increased recreational benefits will be realized for hunters, wildlife watchers, and other recreational users as wildlife utilization of these areas increases.

NWTF-MA greatly appreciates the efforts of the DCR to improve the health and resiliency of our public forests. Several of the proposed projects are being completed in support of the Massachusetts Dynamic Forest Restoration Initiative, of which DCR and NWTF are both partners. This landscape level effort to improve forest health across public and private forestlands in the Berkshires is a model for achieving greater conservation impact through collaboration and partnership. We look forward to working with DCR in the future to successfully bring this effort to fruition.

Sincerely, Keith Fritze

Massachusetts NWTF State Chapter President

**Comment Number 10**

Tue 11/1/2022 2:01 PM

To Director Church,

Thank you for offering Mount Grace Conservation Land Trust the opportunity to comment on Massachusetts’ DCR proposal for upcoming state forest management programs across nine towns in the Commonwealth, as outlined in your virtual public meetings on October 18 & 20, 2022. Established by foresters, Mount Grace’s mission is to protect and conserve land, and the encouragement of land stewardship.

Mount Grace strongly supports DCR’s forestry program recommendations, and we applaud the agency’s efforts to advance sustainable forest management across the Commonwealth. It is critical that the State play a leadership role in modeling effective and innovative land stewardship. Without active thoughtful, science-based management Massachusetts forests are in danger of losing critical biodiversity, wildlife habitat and climate resilience. The history of forest management in the commonwealth has resulted in a lack of diversity of age classes, a lack of forest structure, as well as significant stands of diseased trees. Exacerbated by extreme weather events, we could face significant mortality events. This could result in massive releases of carbon, where we urgently need increased forest health to maximize both carbon sequestration and storage.

As the largest landholder in the State, we depend on DCR to have the highest standards of forest stewardship. DCR and Mount Grace have a long tradition of collaborating to protect some of our most unique and important landscapes. We are optimistic that DCR will steward those lands to maximize the climate resilience and wildlife habitat of the commonwealth.

In addition to the concerns for Massachusetts forest health, at Mount Grace we are also concerned about the environmental impacts of building materials. Building with wood is far better for the environment than utilizing alternative materials like steel and concrete. Massachusetts currently sources less than 3% of its lumber from the state, the remainder travels increasing the carbon footprint of the construction and is often sourced from states and locations with lower forestry standards. We should be encouraging the use of local lumber for the sake of our state’s economy as well as our concerns for climate change.

We rely upon DCR to play a leadership role for other States and for landowners. The current 2022 proposals are exemplary of sustainable forestry and we at Mount Grace support them wholeheartedly.

Respectfully,

Emma G Ellsworth

Executive Director Mount Grace Land Conservation Trust

**Comment Number 11**

Tue 11/1/2022 2:13 PM

Commissioner Doug Rice

Dept. of Conservation and Recreation

251 Causeway St., 9th Floor

Boston, MA 02114

October 28, 2022

Re: Comments – Forest Management Project Proposed 2022, Ant Lot, October Mtn. Forest

Commissioner Rice,

This letter is in response to the devastating cutting plan proposed for the “Ant Lot” in October Mountain Forest in the Town of Washington. 447 acres of logging – that is outrageous! This is clearly a thinly disguised plan to harvest ash trees for profit. There were no specific reasons given for this massacre in the 2022 Forest “Management”

Proposal, just the usual justifications. I see none of the other 2022 projects come close to this proposed acreage.

As a regular hiker and skier in October Mountain Forest, I know exactly where this area is. This “project” at the Four Corners will eliminate the Ashley Trail (a nice ski trail) and come very close to the Appalachian Mountain Trail. Besides ruining the habitat for wildlife, water quality and soil retention, it makes the area unusable and unsightly for years to come. Logging contractors are not properly overseen onsite by DCR and leave a terrible mess that we get to look at for years. This is totally unacceptable.

Just at a time when we need as many trees as possible to reduce carbon emissions, DCR is planning to cut 447 acres for no good reason. How are we ever going to meet our climate goals if DCR keeps logging our forests? I do not see why the public must just lie down and take these logging plans year after year.

It is time for the DCR to join the 21st Century and stop focusing on logging and change their mission to studying plants and wildlife, measuring sequestration, overseeing water quality and soil erosion, maintaining public trails and parks, as well as controlling gate access to our forests.

It is time we start protecting our forests instead of decimating them.

Susan Purser

Becket, MA 01223

**Comment Number 12**

Tue 11/1/2022 4:10 PM

Dear DCR Forestry staff:

Attached are comments on Department of Conservation and Recreation proposed management projects in ten state forests. They are signed by more than 80 organizations and individuals. We look forward to your response to our concerns and suggestions.

Thank you for the opportunity to comment on these proposed projects. Please do not hesitate to contact me, or any of the other signers of the letter, if you have any questions.

Sincerely,

Michael Kellett

Executive Director  
RESTORE: The North Woods

TO: Massachusetts Department of Conservation and Recreation

RE: Comments on DCR Forest Management Projects Proposed for 2022 DA:

November 1, 2022

We write to submit our comments on the proposed Department of Conservation and Recreation (DCR) forest management projects in ten state forests: October Mountain, Bryant/Berkshire Snow Basin, Warwick, Savoy Mountain, Otis, Sandisfield, Dubuque, Myles Standish, Manuel Correllus, and Townsend. (https://www.mass.gov/guides/forestmanagement-projects#-forest-management-projects-proposed-2022-)

We have commented extensively in the past on DCR’s forest management plans, and have objected to cutting in our state forests for the purposes of: a) carbon capture and storage, b) treatment for insects and disease, c) fire prevention, d) ecosystem restoration, e) liquidation of plantations, f) improvement of wildlife habitat, g) improvement of recreational experiences, h) sustainable wood products, i) diversification of even-aged forests, and j) forest restoration. We note that these goals of DCR are included in one or more of the 2022 proposed projects. We have attached comments for the past three years for reference, explaining our objections.

We continue to object to these reasons for forest management on state land for the reasons we have expressed in the past.

On the other hand, DCR’s 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines includes guidelines for Reserves that are generally reasonable and offer protection and management that is more in line with public sentiment and independent scientific research. This includes oversight provided by the Forest Reserves Scientific Advisory Council (FRSAC), consisting of conservation biologists and forest ecology experts, to assist and review management and major restoration activities within Reserves. Those guidelines define and outline management actions allowed in Reserves, per the excerpts below. (<https://archives.lib.state.ma.us/bitstream/handle/2452/200210/ocn816519530.pdf>):

2.1 Reserves – Purpose [p. 15] The primary purpose of setting aside large areas of forest as Reserves is to allow forests to develop relatively unimpeded by human disturbance and to create late successional habitat. Given a sufficient amount of time without major disturbances, the forest will develop characteristics associated with true old growth forest. These late successional and old growth conditions include a wide diversity of tree sizes and ages, tip‐up mound topography, and micro‐site conditions from fallen trees and large amounts of downed woody debris….

2.3 Management Approach for Reserves [p. 16-17] The dominant ecosystem service objectives in Reserves will be:

• biodiversity expansion, including complex forest systems

• carbon sequestration

• provision of wilderness recreation opportunities

Management of Reserves should allow natural processes to determine the long‐term structure, composition, function and dynamics of the forest to the maximum extent possible.

**[Management Priorities in Reserves] [p. 3-4]**

Reserves will conserve large contiguous blocks of high‐value ecosystems…. There will be no commercial harvesting of timber in Reserves.

Silviculture and Vegetation Management Guidelines: [p. 22]

A. Habitat manipulation, silvicultural treatments and commercial harvesting operations are not permitted in Reserves. However, if deemed appropriate by DCR and reviewed by the FRSAC, the following exceptions may be allowed: a) Implementation of NHESP recommendations to restore, maintain or enhance habitat for rare and endangered species and exemplary natural or rare communities.

b) Removing plantations would not be permitted except to restore important wildlife habitat such as pitch pine barrens or other habitats and after consultation with DFW and FRSAC.

c) Removing non‐native invasive species may occur after consultation with FRSAC.

d) Managing vegetation to control erosion, or to stabilize soils.

e) Cutting of vegetation to maintain established public vistas and trails is permitted (e.g., the small Spruce Mountain vista located in Monroe State Forest).

f) Removal of hazardous trees directly adjacent to official DCR trails and abutting properties that pose significant risk to public safety.

g) Vegetation management is permitted by parties who have secured pre‐existing rights (e.g., easement holders, utility easements) to perform such activity, subject, however, to standard regulatory and permitting requirements.

h) Cutting vegetation to maintain existing agricultural fields or existing wildlife habitat openings is permitted.

B. Creation of new fields, vistas and wildlife openings is prohibited.

We request that all of the 2022 DCR Forest Management proposals be limited to activities allowed in Reserves, under the review and guidance of the FRSAC, as specified in the 2012 DCR Selection Criteria and Management Guidelines (cited above). We also request that DCR designate all of the lands encompassed by these management proposals as new Reserves as soon as possible. In addition, we request that the public remain informed and engaged in management proposals on all DCR properties. Thank you for the opportunity to comment on these forest management proposals.

Sincerely, \* see email for complete list of signatories

**Comment Number 13**

Tue 11/1/2022 4:10 PM

Attached please find our comments on DCR's proposed 2022 Forest Management projects.

Chris Egan

Executive Director

Massachusetts Forest Alliance

Peter Church

Director of Forest Stewardship

Department of Conservation and Recreation

251 Causeway St, Suite 900 Boston, MA 02114

Mr. Church:

The Massachusetts Forest Alliance represents forest landowners, foresters, timber harvesters, and forest products companies in Massachusetts. I’m writing with comments regarding DCR’s proposed forest management projects in state forests for 2022.

First, we wanted to thank DCR for the very informative presentation they offered to the public on these projects. DCR thoroughly discussed the issues, including climate change, that inform their decisions on these projects.

Additionally, Bill Van Doren’s presentation was truly eye-opening. To see that Massachusetts is producing a tiny fraction of the wood its citizens use is perhaps not shocking, but the sheer difference in consumption vs production is still staggering. Just as local food is good – it supports local farms and delivers healthy, fresh foods – local wood is equally good and important, as it preserves forestland as forest, supports desperately-needed jobs in rural towns, and contributes to climate resilience in our forests with proper silviculture.

Perhaps the most stunning piece of Bill Van Doren’s presentation involved analysis of DCR’s Continuous Forest Inventory. Measuring a large number of designated plots over the last 60 years has created a huge dataset packed with valuable information. We’re very happy to see that DCR is publicly sharing more and more of this information and analysis.

To learn that almost 19 percent of DCR lands had negative net growth was a shock – that means those stands are actually releasing more carbon into the atmosphere than they are sequestering. Invasive insects and diseases have taken a significant toll on our forests, but we’re also seeing the end stages of plantations – particularly red pine – planted by the Civilian Conservation Corps during the Great Depression. The red pine scale has absolutely hammered these stands, which were extremely vulnerable as monoculture plantations. Much of DCR’s forest management work in recent years has focused on cutting dead and dying plantation trees to release the native mixed-species forest regenerating underneath. By doing so, DCR is essentially conducting restorative forestry that releases fast-growing younger trees that collectively sequester carbon at a high rate.

This work aligns with scientific research that shows that climate-smart forest management can lead to additional sequestration. While most people believe that this means delaying harvest or cutting fewer trees, this is true mostly in understocked stands in northern New England. In Massachusetts, our stands are often overstocked, and thinning can improve productivity and actually increase carbon sequestration rates.

This science drives EEA’s 2025/2030 CECPs and the forthcoming 2050 CECP, was detailed in the 2050 Roadmap, and is part of private efforts such as the new Highstead Forests as a Natural Climate Solution report and the New England Forestry Foundation’s 30 Percent Climate Solution.

DCR’s work in these proposed projects lines up with climate science as well as clearly demonstrated needs for enhanced wildlife habitat and fire risk reduction. Your new project plans are clear and packed full of detailed information that makes a clear case for management.

Some projects include addressing dying plantations. Others reduce fire risk, enhance wildlife habitat, control diseased beech populations, improve recreational opportunities, and more. We believe these various projects are well-considered, fully justified, and represent thoughtful and sustainable forest management.

Thank you for your consideration of our comments.

Sincerely,

Christopher Egan

Executive Director

**Comment Number 14**

Tue 11/1/2022 4:58 PM

**Note this email was received as a “corrected” email. This email included comments on projects for 2019, 2020,2021 and 2022. Please see email attachments for details.**

Dear DCR Forestry staff:

Attached are comments on Department of Conservation and Recreation proposed management projects in ten state forests. They are signed by more than 80 organizations and individuals. We look forward to your response to our concerns and suggestions.

Thank you for the opportunity to comment on these proposed projects. Please do not hesitate to contact me, or any of the other signers of the letter, if you have any questions.

Sincerely,

Michael Kellett

Executive Director  
RESTORE: The North Woods

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RE: Comments on DCR Forest Management Projects Proposed for 2022 DA:

November 1, 2022

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We have commented extensively in the past on DCR’s forest management plans, and have objected to cutting in our state forests for the purposes of: a) carbon capture and storage, b) treatment for insects and disease, c) fire prevention, d) ecosystem restoration, e) liquidation of plantations, f) improvement of wildlife habitat, g) improvement of recreational experiences, h) sustainable wood products, i) diversification of even-aged forests, and j) forest restoration. We note that these goals of DCR are included in one or more of the 2022 proposed projects. We have attached comments for the past three years for reference, explaining our objections.

We continue to object to these reasons for forest management on state land for the reasons we have expressed in the past.

On the other hand, DCR’s 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines includes guidelines for Reserves that are generally reasonable and offer protection and management that is more in line with public sentiment and independent scientific research. This includes oversight provided by the Forest Reserves Scientific Advisory Council (FRSAC), consisting of conservation biologists and forest ecology experts, to assist and review management and major restoration activities within Reserves. Those guidelines define and outline management actions allowed in Reserves, per the excerpts below. (<https://archives.lib.state.ma.us/bitstream/handle/2452/200210/ocn816519530.pdf>):

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B. Creation of new fields, vistas and wildlife openings is prohibited.

We request that all of the 2022 DCR Forest Management proposals be limited to activities allowed in Reserves, under the review and guidance of the FRSAC, as specified in the 2012 DCR Selection Criteria and Management Guidelines (cited above). We also request that DCR designate all of the lands encompassed by these management proposals as new Reserves as soon as possible. In addition, we request that the public remain informed and engaged in management proposals on all DCR properties. Thank you for the opportunity to comment on these forest management proposals.

Sincerely, See email for complete list of signatories.

**Comment Number 15**

Tue 11/1/2022 10:22 PM

Dear DCR public lands logging staff,

Please accept these comments on the 10 proposed 2022 logging projects that you are planning to conduct on our publicly-owned forested lands. My comments apply to all of the logging projects, since all of them are being conducted in the same manner, while the public is being excluded from having any meaningful say in how our forests are being chopped down for private profit.

1. The proposed commercial logging projects violate MGL Chapter 132A, Section 2B, which states that "It is hereby declared to be the policy of the commonwealth that all such sites acquired or developed by the commissioner shall in so far as practicable be preserved in their natural state..." What you are proposing is the opposite of "preserved" and the projects that you are planning will not result in the forests being left in their natural state. In addition, C132A, s. 2B goes on to state that "...that no commercial activities except those essential to the quiet enjoyment of the facilities by the people shall be permitted." Thus, what you are planning requires that you find that the commercial logging activities that you plan must be deemed "essential" to the quiet enjoyment of the people. You have not issued such a "finding" and therefore you are not entitled to conduct commercial timber logging on public lands. Doing so will be a clear violation of Mass General Law.

2. The main justification that DCR uses to conduct commercial logging projects on our publicly-owned forests is that these areas have been designated as "Woodlands" in accordance with a conconted, self-serving process dreamed up by DCR to allow the agency to continue logging in spite of intense public opposition. The Landscape Designation process that DCR uses is completely arbitrary, the public has no meaningful say in how the lands are allocated, and only DCR gets to make decisions about how and when our publicly-owned lands will be logged for the benefit of private financial interests. This most recent "revision" of the Landscape Designation process was conducted internally by DCR (and DFW), no draft document or proposal was circulated for public comment, no legitimate planning process was followed, and the so-called public meetings that were held were orchestrated by DCR staff who controlled the discussion and input by limiting the breakout groups to a few bogus talking points that were essentially irrelevant and seemed meant to waste everyone's time and energy. The whole process was a just a pathetic attempt to justify business as usual, and even though there was uniform opposition expressed to public lands logging at every public meeting, DCR never addressed the public's concerns in any meaningful way, except to develop better buzzwords like "climate-smart forestry" and "climate resilience" while trying to greenwash the degradation of our mature public forests. The landscape designation process follows no legislative direction, no actual law, and is not based on any set of regulations. The entire thing is illegitimate from start to finish. The fact that DCR has to rely on such a concocted foundation in order to continue to sell off public assets in a manner that gives the public no say in what is being done only reinforces that DCR is conducting a corrupt racket that should be subject to RICO enforcement.

3. The public lands commercial logging projects proposed by DCR violate the requirements of the MEPA enabling legislation found in MGL Ch. 30, sec. 61, which requires that actions conducted by the State consider the impact on climate change, greenhouse gas emissions, and sea level rise. Logging is the most destructive impact on our forests, resulting in more tree mortality than all other causes of tree death combined. Yet DCR refuses to analyze the climate impact of cutting down mature trees and the forest degradation caused by commercial logging, and instead claims that they are "helping" the forest, or adding younger age classes, or improving resilience, or removing disease, or creating important habitat for early successional species, or other such BS. DCR has never conducted an honest analysis of the climate impacts or GHG emissions from their logging projects, many of which continue to bleed CO2 to the atmosphere for decades after the logging impact. DCR has never disclosed the results of this analysis, even though the public has been demanding such an honest accounting for the past 10-years or more. Instead, DCR continues to act as a complete climate denier, ignoring laws that require every state agency to reduce the GHG emission from their activities by 50% by 2030 and 85% by 2050. Apparently DCR considers itself exempt from MEPA and all other climate laws. These proposed logging projects intentionally violate numerous laws. Such continued action by the DCR Management Forestry Program amounts to a criminal conspiracy to violate the law.

4. These proposed logging jobs also violate the MEPA regulations by inappropriately using a threshold that can not possibly apply to public land logging when State funds are being used and publicly-owned trees are being chopped down. The threshold (exemption) found at 301 CMR 11.03(1)(a)1 can not possibly be applied to DCR logging since the exemption only applies to less than 50 acres. The claim that DCR is following an "approved forest cutting plan" is also bogus, as explained below in #5. In addition, bu using this logging loophole, DCR has continuously failed to conduct the proper cumulative impact analysis as required by MEPA due to the clearly linked projects at the programmatic level as well as temporally. This failure violates the anti-segmentation provision of MEPA, in that these are all related actions being conducted by the DCR under a program of commercial logging of our public lands.

5. The DCR currently abuses the regulations found at 302 CMR 16 to claim that since they have an approved work order, they can log the public forests wherever they want. However, the process that DCR uses is so self-serving and corrupt that it is beyond outrageous. DCR gets to pick the areas that they want to cut, then they write the cutting plan and submit the plan to themselves to review. The public is scammed into thinking that they have input into the process by DCR offering a 45-day comment period which is completely meaningless. The public has no say, since DCR gets to approve the plan that they submitted to themselves, and according to DCR's interpretation of the regs, DCR is the "applicant/owner" and therefore, if DCR doesn't like the plan that they wrote, submitted to themselves, and approved, then only DCR can appeal the decision to DCR. This process is so corrupt that it is completely unbelievable. It is such an outrageous violation of due process that it makes your head spin. This is a corrupt act being conducted by a corrupt organization. The entire process violates every standard practice of administrative procedure, but DCR continues to use this bogus process to conduct their commercial logging jobs on our public lands.

6. The Best Management Practices (BMP) that DCR claims to follow are out-dated and do not address the climate emergency. These guidelines need to be updated in light with current climate laws. Not a single BMP addresses carbon sequestration, carbon storage, climate impact, GHG emissions, or any of the other known impacts of commercial logging. In addition, the BMPs are voluntary, unless they are specifically incorporated as contract requirements of the logging approval by the same DCR employee who writes the plan and submits it to DCR so that DCR can approve their own plan. This makes a mockery of the BMP process since there is no way that DCR can enforce the contract conditions on itself. There is no public oversight of the logging jobs, and the situation is entirely one in which the fox is guarding the henhouse. but even worse. The process has zero credibility in the public's eye.

REQUEST FOR STAY OF IMPLEMENTATION

For the above reasons, I request that all commercial logging jobs proposed for 2022 be stayed, on all 2,336 acres, until such a time as the laws and regulations can be followed. As listed above, these actions are likely to violate numerous laws and regulations, and failing to stay their approval and implementation will result in intentional violations which will be considered malicious. Failure to stay this illegitimate and illegal program will result in damage to the environment, damage to the climate, and will entail an irretrievable commitment of resources that will cause harm to the public, the true owners of the lands being abused by DCR.

Sincerely,

Glen Ayers

Greenfield, MA