

Appendix I. Original Public Comments received between October 30 and December 20, 2009 in alphabetical order by organization or individual name.

-----Original Message-----

From: Dunes Edge Campground [mailto:dunesedge@verizon.net]

Sent: Monday, November 30, 2009 2:16 PM

To: Wildlife, Mass (FWE)

Subject: Forest Certification comment

For your Forest Certification comments many concerned citizens for conservation along with the Save the Greenway Coalition urge you to include the 53.2 acres of the Provincetown Route 6 corridor.

The Provincetown Route 6 corridor is the gateway to Provincetown and should always remain a greenway. The Route 6 corridor acts as a buffer for the fragile sand dunes which would suffer more erosion if it did not stay forested. The land through which Route 6 travels has healed itself from the highway construction of 1953 and is now beautiful forest acting as a buffer between Route 6, adjacent wet lands and the sand dunes which abut the Cape Cod National Seashore.

Many citizens along with the Provincetown Conservation trust have been working to protect this corridor for the last twenty years. The town has received state and federal grants for the greenway. Massachusetts Fisheries and Wildlife have contributed to protecting the corridor by conservation of 122 acres. The Provincetown Conservation Trust has raised money from visitors and residents as well.

We urge you to include the 53.2 acres in the Provincetown Route 6 corridor in Forest Recertification as it is a critical anchor for the sand dunes, wetlands, plants, migratory birds and other wildlife.

Thank you for consideration.

Miriam A. Collinson

P.O. Box 875

Provincetown, MA 02657

-----Original Message-----

From: Rgelks [mailto:rgelks@mymailstation.com]

Sent: Monday, November 30, 2009 2:24 PM

To: Wildlife, Mass (FWE)

Subject: Forest Certification Comments

To Whom It May Concern:

I appreciate the opportunity to comment on your recent decision to remove 53 + acres of land in Provincetown from your Forest Certification Listings. (these acres were certified in 2004) I understand that this land is described as "just highway corridor" but here at the end of the Cape, any open space, particularly those with any vegetation or trees, is vitally important to the well-being of the wildlife community; these woods are the only areas they have on this sandy spit in which they can travel, rest and hunt. We have so very little wooded areas left. I urge you to place these acres back on the Forest Certification program and help us protect the wildlife on our end of the Cape.

Thank you for your time,

Robin Evans
Provincetown, Ma

-----Original Message-----

From: Becky Kalagher [mailto:bstra@charter.net]

Sent: Sunday, December 20, 2009 7:19 PM

To: Wildlife, Mass (FWE)

Subject: FSC Re-certification (NOT)

FSC CERTIFICATION IS AN INAPPROPRIATE PROGRAM FOR MASSACHUSETTS PUBLIC LANDS. I DON'T WANT IT.

These following points very aptly point out all the issues that I agreed with.

**Sincerely yours,
Becky Kalagher
24 Glenn Street
Douglas MA 01516
508-476-3960**

1. FSC standards are designed to promote sustainable commercial timber extraction from industrial-based lands and are not suitable for tracts of public lands held predominantly for preservation, ecological restoration and recreational services. The purposes for management of public lands are supposed to be to support ecosystem functions, not to be in the timber business. A market driven system has no place overseeing management of public lands.

2. FSC Certification, as a market-based management tool, undermines conservation efforts in Massachusetts public forests where no such commercial imperative exists, and has hindered efforts to give greater preference to biological diversity, ecological restoration, and recreation. On behalf of FSC, Scientific Certification Systems assessments have criticized the Commonwealth for not producing greater amounts of board feet from public forest lands, placing production before conservation, encouraging the state to capture market value of growing trees, rather than allowing them to proceed to late successional or old growth status.

3. FSC is a private organization in competition with other certification systems with a vested interest in increasing and keeping lands under their certification.

4. The FSC auditing company, Scientific Certification Systems, benefits financially from keeping FSC in business and keeping clients certified. SCS has displayed a lack of understanding of the significant nature of the controversies related to the forestry policies on DCR lands which led to the defacto logging moratorium put in place by the Commissioner of DCR and the DCR Stewardship Council. For details see SCS desire to control any and all future moratoriums: CAR 2009.1 and accompanying discussion (beginning on page 55) SCS report: http://www.mass.gov/Eoeea/docs/eea/lf/green_certification_report_2009.pdf

5. The auditors of Scientific Certification Systems do not respect or understand the intent of MGL c. 21 s. 2F which requires full value Resource Management Plans for each DCR park, reservation and forest. Although the Northeast Standard requires that a client complies with all state laws, they conveniently deem compliance with this law as unnecessary to meet FSC requirements. MGL c. 21 s. 2F was intended to find balance among competing values on Massachusetts public lands. This balance is being ignored by SCS. See discussion of Criterion 7.1 (beginning on page 95) of the SCS report.

6. SCS revised its requirement for site specific forest management plans when the state did not comply. SCS is not concerned that the district forest management plans have made no effort to set aside any areas as parklands or recreational assets where commercial timber harvesting will be prohibited to allow for dispersed and accessible recreation.

7. FSC certification also makes no mention of the other economic values state public forests provide, such as preserving aesthetic and scenic areas for the tourism values they provide. Economic value to certification is simply timber value.

8. SCS has not questioned why there are so many FOIA requests from citizens with respect to 2 forestry issues. Instead of investigating reasons for these public requests, SCS bemoans the fact that valuable time is wasted in responding to public complaints by the agencies, and implies that it might be advantageous for the state to charge citizens more money for responses to the requests. See Recommendation 2009.1 and discussion (beginning on page 63) SCS report.

9. Climate change is upon us but not covered by FSC certification. Our state forests play a significant role in mitigating the effects of climate change. FSC certification does not take climate change into consideration in any of its forestry guidelines. See: (page 44) SCS report: public input comment suggests all ecosystems are at risk; the agencies don't know how to address this and current policies are archaic in the face of the climate change situation.
SCS response: not specifically addressed in the FSC standard.

10. FSC Certification has been used to leverage funding from the legislature to facilitate commercial logging on public lands. Scarce funds have been diverted from Massachusetts public land ecological and recreational stewardship goals as a result, for the purposes of constructing logging roads, mapping public forest land for timber production and other expenses to prepare the lands for logging. FSC is a net money loser for Commonwealth taxpayers, costing far more than any financial benefits, and represents a subsidy for the wood products sector.

11. FSC Certification has not provided the oversight and enforcement needed on MA forestry operations. Despite claims to be a performance based system, in

practice it relaxes standards, adjusts deadlines and lavishes praise upon promises, progress and good intentions. Audits often rely on documentation from the members of the forestry staff themselves and thus do not attempt to maintain the claimed independent nature of the assessment.

12. FSC Certification is an unnecessary expense, an extra bureaucratic layer, and is not codified in state law, when what we need is stronger state laws and enforcement mechanisms defining a smaller percentage of state lands where exemplary forestry will set an example of performance to the highest standards.

-----Original Message-----

From: Paul Lauenstein [mailto:lauenstein@comcast.net]

Sent: Monday, December 21, 2009 11:26 AM

To: Wildlife, Mass (FWE)

Subject: FSC certification

I believe that FSC Certification is an inappropriate program for Massachusetts public lands for the following reasons.

1. FSC standards are designed to promote sustainable commercial timber extraction from industrial-based lands and are not suitable for tracts of public lands held predominantly for preservation, ecological restoration and recreational services. The purposes for management of public lands are supposed to be to support ecosystem functions, not to be in the timber business. A market driven system has no place overseeing management of public lands.

2. FSC Certification, as a market-based management tool, undermines conservation efforts in Massachusetts' public forests where no such commercial imperative exists, and has hindered efforts to give greater preference to biological diversity, ecological restoration, and recreation. On behalf of FSC, Scientific Certification Systems assessments have criticized the Commonwealth for not producing greater

amounts of board feet from public forest lands, placing production before conservation, encouraging the state to “capture market value” of growing trees, rather than allowing them to proceed to late successional or old growth status.

3. FSC is a private organization in competition with other certification systems with a vested interest in increasing and keeping lands under their certification.

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Paul Lauenstein

4 Gavins Pond Road

Sharon, MA 02067

781-784-2986



December 21, 2009
Bureau of Forestry
Department of Conservation and Recreation
Box 484
40 Cold Storage Drive
Amherst, MA 01004
Via Email: fsc.comments@state.ma.us

Re: FSC Re-Certification

Dear DCR Bureau of Forestry:

On behalf of Mass Audubon, I submit the following and attached comments on the re-certification of Department of Conservation and Recreation¹ (DCR) lands by the Forest Stewardship Council (FSC). Mass Audubon recommends that the Commonwealth undertake a more complete public review of the costs and benefits of FSC Certification, including evaluation of certification in relation to the recommendations that will be issued

by the DCR Forest Vision process in early 2010, before making a final decision on whether to proceed and if so which properties to include. At a minimum, Mass Audubon recommends that the scope of re-certification be further narrowed to exclude additional lands where parkland values predominate. We also recommend that DCR

formally adopt the High Conservation Value Forest (HCVF) provisions prepared by the Division of Fisheries and Wildlife (DFW), including designation of all Priority Habitats for rare species associated with closed-canopy forest and all late-seral forests (dominated by trees >150 years in age) as HCVF.

DCR's limited resources to plan and undertake forestry should be directed to a smaller subset of lands where conflicts with other public interests are minimized. This would enable an agency that is struggling under severe budget constraints to focus its forestry work and demonstrate exemplary silvicultural practices in carefully selected locations. Rebuilding of the public trust in regards to stewardship of the state lands is of paramount concern.

As noted in our comment letter of April 6, 2009 (attached), FSC Certification has its pros and cons. Mass Audubon supports application of high forestry standards to public lands that are appropriate for active forest management. We also support the development of management plans with public input, integrating all of the public interests inherent in these lands including stewardship of natural and cultural resources, recreational values, and sustainable forestry where appropriate. Such integrated planning, along with coordination of forestry between DCR and the Department of Fish and Game, is required by law (MGL Ch. 21 S.2F <http://www.mass.gov/legis/laws/mgl/21-2f.htm>). The FSC Certification process promised to provide high standards including management planning requirements, compliance with all state laws, and third-party oversight to ensure compliance and transparency. As the process has played out as a practical matter, these benefits have been only partially achieved. Nine large reserves were designated and substantial

¹ These comments are focused primarily on the DCR Division of Parks and Recreation (DSPR) lands, which are the subject of the DCR Forest Vision process. The FSC re-certification review also includes DCR Division of Watershed Management and Division of Fisheries and Wildlife (DFW) lands. Some of the re-certification review report conditions and public comments relate to watershed and/or DFW lands. Mass Audubon supports management of the watershed lands for the water supply protection purposes for which they were acquired. Publicly reviewed management plans for the watershed lands have been in place for many years and are periodically updated. Mass Audubon also supports DFW's application of ecological management and wildlife biology expertise in management of its lands for the benefit of native plants and animals.

progress was made in forest inventories, boundary marking, and other fundamental planning work. However, staff and funding constraints and a confusing and duplicative set of planning processes within DCR, along with public concern regarding certain management activities (especially clear cutting), have slowed completion of management plans and those that were completed have been the subject of significant public criticism.

The 2009 re-certification review report acknowledges many of the public concerns about management of their public lands, which is positive in that it contributes to transparency and accountability. However, it remains unclear exactly how and when all of these concerns will be resolved. The state needs to respond in detail and meaningfully to these concerns, before final decisions are reached on proceeding with re-certification and undertaking any significant new cutting operations. DCR is undertaking a Forest Vision process that was initiated in response to public concerns. It is important that this process be completed and all public input and the final Vision report recommendations be meaningfully considered in DCR's decision about whether to continue with FSC Certification and if so on which properties.

Scope of Certification – Properties to be Excluded:

The re-certification review report requires public input on the scope of properties subject to recertification. As noted above, Mass Audubon believes that DCR cannot complete this review process for the DSPR lands until the Forest Vision process is concluded. Following that process, DCR will need to identify which properties will be designated as Parklands, and further public review may be required to refine and conclude those designations. Mass Audubon recommends that all properties called "State Park" in their official name be considered to be Parklands and excluded from FSC Certification, until and unless such time as it is determined through a publicly reviewed management planning process that any of these sites or portions of them are appropriate for active forestry. It should be noted that there are two different statutes for DCR land acquisition: MGL Ch. 132 S.2 for state forests for forestry purposes and 132A S.1 for parks and reservations for recreation and conservation purposes. Apparently the state has not kept careful property-based acquisition history summaries to document the basis on which various properties were acquired, so it is difficult to determine instances where property donors or the state when purchasing intended that forestry would be allowed or prohibited.

Mass Audubon also recommends that the following properties be excluded from certification pending public review of the proposals submitted by Friends of Boxford State Forest and Robert Leverett for Reserve designations: Boxford State Forest, Skinner State Park, Mount Holyoke Range State Park, Mount Sugarloaf State Reservation, and Mount Tom Reservation. We also request that modifications to the district plans be considered to expand the large forest Reserve network where the state owns lands that are part of the large forest blocks mapped by The Nature Conservancy, and to make the area around Buckley Dunton Lake in October Mountain State Forest a Reserve or Parkland. Other additions to the Reserves that should be considering include lands around Upper Spectacle Pond (in Sandisfield) and Wendell State Forest. Wachusett Mountain State Reservation should be considered for Reserve and/or Parkland status because of the Old Growth Forest located there and its other exemplary scenic and recreational attributes. Finally, we note that Acushnet Cedar Swamp in the Southeast Region is a designated National Natural Landmark and that its rare habitats make it appropriate for consideration as a Reserve and/or Parkland. These recommendations are a first cut and Mass Audubon strongly encourages DCR to fully engage the public at large in review and revision of the existing management plans as well as new plans for areas that presently do not have an approved plan.

Mass Audubon encourages the state to take a precautionary approach to forestry planning, and to carefully select a subset of DCR DSPR lands for active management, avoiding locations of high conservation, recreational or scenic value. By focusing forestry on a smaller percentage of the DSPR lands and selecting those based on areas that are most suited to demonstrate high quality forestry with a minimum of conflicts with other public interests, DCR can apply its limited resources efficiently while rebuilding public trust in its forestry activities.

Compliance with FSC Standards and State Statutes

FSC requires that landowners comply with a series of standards (principles) and associated criteria in order to qualify for certification. The 5-year review conducted by the Scientific Certification Systems (SCS) in coordination with an independent audit team resulted in a detailed, 104 page report. The report lists strengths and weaknesses in relation to the standards, three Major Corrective Action Requests (CARs), seventeen Minor CARs, and nine Recommendations. Major CARs must be resolved before re-certification can be granted. Minor CARs may be addressed at a later date, and the agency could be certified while still working on compliance with these CARs. The Recommendations are advisory in nature and compliance is not required for certification.

Considering that this certification has been in place for five years, it is disappointing that so many aspects of compliance with the FSC standards remain unresolved. FSC certification is touted as evidence that an entity has achieved compliance with high standards. As one example, the abuse of public lands by illegal riding of Off-Road Vehicles continues unabated despite the efforts applied to analyzing the issue and proposing legislative improvements. The CARs also cite inadequacies in the following areas:

- ☐ boundary markings and road and trail inventories;
- ☐ consultation with Native American tribes;
- ☐ staff training and budgets to fulfill management objectives;
- ☐ protection of regeneration;
- ☐ issues related to patch and clear cuts;
- ☐ protection for seeps and springs;
- ☐ ecological information in silvicultural prescriptions;
- ☐ plans for managing reserves; and
- ☐ monitoring for High Conservation Value Forests (HCVF).

It is understandable that a certification auditing process would lead to identification of a few items needing correction and recommendations for further continuing improvement in the certified entities' work. However, the number and scope of CAR's indicates that the concerns are more than minor and isolated.

Mass Audubon objects to Minor CAR 2009.1, which requires the state to complete a social and economic impact assessment prior to implementing declared or *de facto* harvesting moratoria. The current limits on cutting were imposed because of public concerns regarding the social and economic effects of harvesting, particularly various clear cutting operations, which are also cited elsewhere in the report as needing examination and potential changes in approach. These are publicly owned lands, and the state government should be applauded, not criticized, for responding to public concerns by curtailing most new harvesting operations while it undertakes a public review process (the Forest Vision process). This condition was initially a Major CAR but was revised to a Minor CAR following clarification from the state that it intends to proceed with harvesting in accordance with approved plans. However, public objections to the four western district DSPR plans were a significant factor leading up to DCR agreeing to undertake the Forest Visioning process. DCR Commissioner Richard Sullivan and the DCR Stewardship Council have publicly stated on several occasions that the approval of these plans was subject to review following the completion of the Forest Vision process². Given this commitment, if FSC recertification is granted it should allow for the revision of the existing plans based on the Vision process and public input, and should not penalize the state for any continuing curtailment of cutting that may be necessary and appropriate while that review is underway.

² See DCR Stewardship Council minutes from November 7, 2008 meeting where three of the four district plans were approved: http://www.mass.gov/dcr/documents/scminutes08_11.pdf. "DCR will convene a statewide public process to balance concerns over forest management on DCR lands – plans will be adjusted at its completion."

The FSC Certification process and 5-year review have not adequately addressed some applicable state laws. The DCR Forest Vision report is expected to include an appendix that will review state laws related to DCR land stewardship and identify provisions needing clarification or that DCR needs to address better in its planning and operations. DCR needs to clarify how it will improve its planning processes to better integrate resource protection, recreation, and forestry as required by MGL Ch. 21 S. 2F. This law also mandates cooperation between DCR and DFW in forestry standards and operations. While it appears there have been some staff discussions about this, a more formal approach needs to be institutionalized within the agencies. In particular, DCR needs to better coordinate with DFW to apply DFW's ecological management expertise in stewardship of the full range of natural communities and rare and common species on DCR lands.

DCR's management plans also need to be revised to better address compliance with the agency's responsibilities under the Massachusetts Endangered Species Act (MGL Ch. 131A). The regulations at 321 CMR 10 have a special section on **Responsibilities of State Agencies**.

http://www.mass.gov/dfwele/dfw/nhESP/regulatory_review/mesa/mesa_home.htm

321 CMR 10.05(1) *All state agencies shall utilize their authorities in furtherance of the purposes of MESA and 321 CMR 10.00: review, evaluate and determine the impact on Endangered, Threatened and Special Concern species or their habitats of all works, projects or activities conducted by them; and use all practicable means and measures to avoid or minimize damage to such species or their habitats...* Unless specifically required otherwise by statute, localities on **state owned lands that provide habitat for state listed species shall be managed for the benefit of such listed species**. Said agencies shall give **management priority** to the protection, conservation, and restoration of Endangered, Threatened, and Special Concern species occurring on state owned lands. **All practicable means and measures shall be taken to resolve conflicts between the protection, conservation, and restoration of state listed species on state owned lands and other uses of such lands in favor of the listed species** [emphasis added]. DFW's designation of all Priority Habitats that support rare species requiring closed canopy forests as HCFV is a step in this direction, and we urge DCR to adopt and carefully apply this and other provisions to actively support rare species in consultation with DFW.

Transparency and Accountability

As noted in the public notice, FSC certification is not appropriate for lands where the parkland values of the properties make them incompatible with active forest management. The Forest Vision process is proposing creation of a new category of DCR land stewardship for Parklands. Mass Audubon supports this recommendation, and we recommend that DCR exclude additional properties that are on the draft re-certification list but which are likely to be considered for parkland status pursuant to the Vision recommendations. See above comments on Scope of Certification for specific suggestions.

Significant benefits of certification include transparency and accountability, through independent third-party reviews and publicly available audits. However, the public involvement processes in FSC Certification are not sufficiently robust to fully support these important goals, especially for public lands. The following areas of public involvement should be strengthened. To the extent these are not required by current FSC procedures, we recommend that the state voluntarily adopt these provisions in coordination with the certification auditing team:

- **Site Visits** – Only the auditors and agency staff have been allowed to participate in the visits to forestry sites that are conducted as part of the annual evaluations. The public should also be allowed to participate as these are public lands. In particular, we are concerned that the reports of the site visits to some of the controversial sites appear to not have recognized what citizen observers have reported (e.g. lack of wetland buffer at Chester-Blandford). Where there is a difference of opinion between agency staff and the public as to what occurred and what the impacts were, the auditors need to hear from both sides, at the site, in order to make an objective judgment.
- **Annual Review** – There should be a well-defined process for the public to provide input to the auditors and agency staff as part of the annual audit process. This should include comments on the management objectives for public lands as well as compliance with existing objectives or management plans.

- **Certification Review Reports** – The auditor prepares a draft report, which the agency can review and comment on. Only after the agency approves of the final report is it made public. We urge that the agencies voluntarily make draft reports and their responses to the auditors publicly available. The public should also be invited to submit comments during the auditing process including feedback on the draft report.
- **Follow-up on Conditions** – The agency's proposed and actual responses to CARs should be made publicly available, with public input welcomed and meaningfully considered. In preparing these comments, it was difficult to comment on several aspects because we are aware that the agency staff are responding (e.g. in regards to early successional habitat management), but the responses have not been made publicly available. The current conditions also require the agencies to post information on monitoring, but do not require consideration of any public input regarding monitoring.

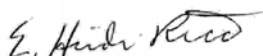
Costs and Benefits

DCR and other state agencies are under serious funding constraints that are unlikely to abate in the near future. Mass Audubon urges DCR to make publicly available a full accounting of all costs associated with FSC Certification, and to carefully evaluate whether this is the most cost-effective means of achieving the goals of exemplary forestry on DSPR lands. We recognize that all forms of land management planning and stewardship have costs associated with them. We respectfully suggest that the time is ripe for a careful review of the costs and public benefits of certification and of forestry operations. By significantly expanding the network of forest Reserves on state lands and designating various properties as Parklands, DCR can focus its limited number of forestry staff on careful planning and strong oversight of active management of a portion of the 300,000 acres within DSPR. Several participants in the Forest Vision process who have expertise in forestry have suggested that DCR could harvest as much or more timber as it has in recent decades while limiting its forestry activities to only 100,000 acres of land, without overharvesting or degrading public values.

Reserves and Parklands also require some costs of land stewardship. But maintaining land in its existing natural state and applying volunteer effort to trail maintenance can meet immediate needs for much of these lands at relatively low costs. In contrast, the level of effort necessary to fully engage the public and carefully oversee forestry is much higher per acre. There is a role for sustainable forestry on state lands, and it needs to be carefully planned within the larger framework of all the public values inherent in these lands.

Thank you for considering these comments.

Sincerely,



E. Heidi Ricci
Senior Policy Analyst

cc: DCR Commissioner Richard Sullivan
DFG Commissioner Mary Griffin
Bob O'Connor, EEA
DWSP Director Jonathan Yeo
Bill Hill, DCR
John Scanlon, DFW, Forest Certification Comment, MassWildlife@state.ma.us



**MASSACHUSETTS
FOREST FIRE
COUNCIL**



PO BOX 133, HAMILTON, MA 01936-0133

December 18, 2008

Forest Certification Comment
Mass Wildlife
1 Rabbit Hill Road
Westborough, MA 01581

Dear Sir or Madam:

Thank you for allowing us the ability to comment on the process as the Massachusetts Division of Fisheries and Wildlife moves forward to certify some of its woodlands with the Forest Stewardship Council.

Your proposal to certify some state lands which have Forest Management Plans in place, to certify additional forests once their formal FMP's have been completed in the future and to exclude those lands and parks (in name) which are not appropriate for FSC certification makes logical sense and this Council can support you in that regard.

We would be remiss however, if we did not express our concern regarding the DFW's ability to provide adequate fire prevention, control and enforcement throughout these holdings. In light of the recent reduction-in-force which has affected the Bureau of Forest Fire Control due to state budgetary problems, such measures would seem difficult at best, with the real possibility of delayed detection, lack of (or delayed) specialized equipment and minimal or no strategic/tactical support for local fire officers who are largely untrained in wildfire operations.

That said, this Council would like to laud the past partnership your Division has had with Dr. William Patterson of UMass-Amherst, and your work with him to reduce the crown-fire hazard within the Montague Plains area. It is our hope that this partnership will continue, or similar ones will be created, to protect not only the wildlife habitats under your control but also the life and property of your neighboring citizens.

I close sending our best regards,

Dennis Annear,
Chief, Orange Fire Department
President, Massachusetts Forest Fire Council

-----Original Message-----

From: Paul Lauenstein [mailto:lauenstein@comcast.net]

Sent: Monday, December 21, 2009 11:26 AM

To: Wildlife, Mass (FWE)

Subject: FSC certification

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6. SCS revised its requirement for site specific forest management plans when the state did not comply. SCS is not concerned that the district forest management plans have made no effort to set aside any areas as parklands or recreational assets where commercial timber harvesting will be prohibited to allow for dispersed and accessible recreation.

7. FSC certification also makes no mention of the other economic values state public forests provide, such as preserving aesthetic and scenic areas for the tourism values they provide. Economic value to certification is simply timber value.

8. SCS has not questioned why there are so many FOIA requests from citizens with respect to 2 forestry issues. Instead of investigating reasons for these public requests, SCS bemoans the fact that valuable time is wasted in responding to public complaints by the agencies, and implies that it might be advantageous for the state to charge citizens more money for responses to the requests. See Recommendation 2009.1 and discussion (beginning on page 63) SCS report.

9. Climate change is upon us but not covered by FSC certification. Our state forests play a significant role in mitigating the effects of climate change. FSC certification does not take climate change into consideration in any of its forestry guidelines. See: (page 44) SCS report: public input comment suggests "all ecosystems are at risk; the agencies don't know how to address this and current policies are archaic in the face of the climate change situation." SCS response: "not specifically addressed in the FSC standard."

10. FSC Certification has been used to leverage funding from the legislature to facilitate commercial logging on public lands. Scarce funds have been diverted from Massachusetts public land ecological and recreational stewardship goals as a result, for the purposes of constructing logging roads, mapping public forest land for timber production and other expenses to prepare the lands for logging. FSC is a net money loser for Commonwealth taxpayers, costing far more than any financial benefits, and represents a subsidy for the wood products sector.

11. FSC Certification has not provided the oversight and enforcement needed on MA forestry operations. Despite claims to be a performance based system, in practice it relaxes standards, adjusts deadlines and lavishes praise upon promises, progress and good intentions. Audits often rely on documentation from the members of the forestry staff themselves and thus do not attempt to maintain the claimed “independent” nature of the assessment.

12. FSC Certification is an unnecessary expense, an extra bureaucratic layer, and is not codified in state law, when what we need is stronger state laws and enforcement mechanisms defining a smaller percentage of state lands where exemplary forestry will set an example of performance to the highest standards.

Paul Lauenstein
4 Gavins Pond Road
Sharon, MA 02067
781-784-2986

-----Original Message-----

From: dminsky4@comcast.net [mailto:dminsky4@comcast.net]

Sent: Monday, November 30, 2009 11:23 AM

To: Wildlife, Mass (FWE)

Cc: Brian Carlson; DMinsky4@comcast.net

Subject: forest recertification

The Provincetown Conservation Commission has noted the fact that your agency has excluded 53.2 acres of land along the Provincetown Route 6 Corridor from forest recertification.

The Commission is uncertain about the practical effects of this exclusion and questions the need for this action. While the land is certainly along a roadside corridor, it also serves as valuable wildlife habitat and is an essential component of our Greenway Project. Open space in Provincetown needs all the help it can get.

We would appreciate additional information regarding this exclusion, and, at this time, go on record as opposing it. Thank you for your attention to this matter.

Dennis Minsky, Chair

Provincetown Conservation Commission

Provincetown Conservation Trust

P.O. Box 307

Provincetown, Ma 02657

www.provincetownconservationtrust.org

pctrust@comcast.net

MassWildlife
1 Rabbit Hill Road
Westborough, Ma 01581

November 30, 2009

Re: "Forest Certification Comment"

Comment period: October 30, 2009 to November 30, 2009

Dear Mass Wildlife,

Please include Provincetown for Forest Certification for the 53.2 acres.

Our organization, Provincetown Conservation Trust has worked very closely for approximately 20 years with Provincetown's Open Space Committee, the Conservation Commission and the town to protect and preserve the forest abutting Route 6. Even though this is a very slim corridor, it is a true wildlife corridor for migrating species that negotiate from Provincetown to Truro to the national Seashore and Mass Wildlife properties.

Provincetown has received numerous state and federal grants over the years specifically on the concept of building and protecting this delicate forest corridor along the highway. We have saved properties that abut and tie into this corridor: Foss Woods, Whistlepath Woods, Fox Run, Nicky's Park and Shankpainter Pond Uplands.

Although there are certain small sections of this highway forest corridor where there are breaks, the corridor still works for species migration. This is the reason it is important to give forest certification to the 53.2 acres in order to bring attention to and protect Provincetown's fragile and sparse forests.

Although we have the National seashore land abutting Provincetown, the park in our area consists primarily of un-vegetated dune, dune grass and scrub pine. Much of the deciduous forest is along the highway corridor, Clapps Pond and Provincetown.
"In the Provincetown/Provincelands Quadrangle only approximately 13% remain in rich deciduous woodlands. 87% consists of un-vegetated dune, dune grass, scrub/pitch pine"
Mike Reynolds, Resource Management, Cape Cod N.S. 1995

We need our resting and nesting areas for local and migratory birds:

"No other town on Cape Cod offers the birding potential of Provincetown....."

In the spring, migrating songbirds and hawks funneled northward along the Outer cape, and, reluctant to cross the water, become concentrated in Provincetown, often in large numbers.” Birding Cape Cod published by the Cape Cod Bird Club and Mass Audubon Society 1994

Many of these state-listed species are living on the highway corridor:

“Provincetown is one of the top two towns in the state of Massachusetts listed as having the greatest density per square mile of state-listed rare species” Our irreplaceable heritage by Massachusetts Natural Heritage and the Nature Conservancy Published Fall 1998

Please give green forest certification to the 53.2 acres that were originally scheduled for exclusion. We need to protect the remaining forests of Provincetown. This should not be categorized as just a roadside corridor. It is a delicate and vibrant part of Provincetown’s wildlife population. The Provincetown Conservation Trust is about to embark on new project to protect another parcel of land which abuts the highway land...all of this to protect the very slim and delicate Provincetown Greenway corridor which resides along the route 6 highway. Please give this land Forest Certification.

Thank You.

Sincerely,

Celine Gandolfo, Pres. & Trustees

-----Original Message-----

From: dminsky4@comcast.net [mailto:dminsky4@comcast.net]

Sent: Monday, November 30, 2009 3:33 PM

To: Wildlife, Mass (FWE)

Subject: forest recertification

The Provincetown Open Space Committee has noted the fact that your agency has excluded 53.2 acres of land along the Provincetown Route 6 Corridor from forest recertification.

The Open Space Committee is uncertain about the practical effects of this exclusion and questions the need for this action. While the land is certainly along a roadside corridor, it also serves as valuable wildlife habitat and is an essential component of our Greenway Project. The Open Space Committee has worked diligently, often in cooperation with state agencies, to protect and conserve land in Provincetown, some of which is adjacent to the land at issue here.

We would appreciate additional information regarding this exclusion, and, at this time, go on record as opposing it. Thank you for your attention to this matter.

Dennis Minsky, Chair

Provincetown Open Space Committee

-----Original Message-----

From: puffin@puffinroom.org [mailto:puffin@puffinroom.org]

Sent: Sunday, November 22, 2009 7:18 PM

To: Wildlife, Mass (FWE)

Subject: FSC

To whom it may concern

I am a resident of Becket. I completely oppose FSC re-certification. Mass Wildlife and DCR have completely mismanaged our state forests over the past several years. I have witnessed thousands of acres of October Mt State Forest illegally clear cut under specious grounds-among them shelter wood cuts. Going back on county road to 4 corners is now a nightmare. DCR has also done a disastrous cut around pristine Buckley Dunton Lake, one of our commonwealth's most beautiful, hidden, wilderness recreation areas.

Head State forester De Maio was less than forthright on every occasion I've ever met him and Commissioner Sullivan must be held accountable and forced to resign for the outrageous, illegal cuts just done in Chesterwood.

DCR plans to harvest, (what an Orwellian term,) 80%of the state forests in the Berkshires is outrageous. International foreign bodies have no business in our state. First a complete moratorium should be place on all logging in state lands and then new state law must be passed.

Mass Wildlife and DCR have demonstrated a complete abuse of the public trust and used "green certification" to hoodwink the public.

Carl Rosenstein

Becket

From: Lincoln Sharpless [mailto:lincoln@atlanticbaysir.com]

Sent: Mon 11/30/2009 4:11 PM

To: Wildlife, Mass (FWE)

Subject: FOREST CERTIFICATION COMMENTS ON PROVINCETOWN ROUTE 6 CORRIDOR

I would like to comment on your decision to remove 53 + acres of land along Route 6 in Provincetown from your Forest Certification Listings. Which parcels of A- N is this land? It is described as highway corridor- but it is more than that. If you use Google Earth for that stretch of land, you will see that it is our greenway- these woods are pretty much the only place that wildlife can use for travel, hunting & rest. This is just a sandy spit without many wooded areas left. I would appreciate it if you would recertify these acres for Forest Certification as it would go a long way to helping protect our wildlife!

Thanks you so very much! Lincoln Sharpless

Best regards,

Lincoln Sharpless

Real Estate Broker

168 Commercial Street

Provincetown, MA 02657

508.487.2430 ext. 104

-----Original Message-----

From: stetspaff [mailto:stetspaff@comcast.net]

Sent: Monday, November 23, 2009 9:20 AM

To: Wildlife, Mass (FWE)

Subject: certification of woodland /forestery areas

I am for recerification of all these areas and I'm sure there are more areas that should be included.



The Nature Conservancy in Massachusetts
205 Portland Street, Suite 400
Boston, MA 02114-1708

tel (617) 227.7017
fax (617) 227.7688

nature.org/massachusetts

Bureau of Forestry
Massachusetts Department of Conservation and Recreation
Box 484, 40 Cold Storage Drive
Amherst, MA 01004

MassWildlife
1 Rabbit Hill Road
Westborough, MA 01581

December 20, 2009

To whom it may concern:

On behalf of the Massachusetts Chapter of The Nature Conservancy, thank you for the opportunity to comment on the list of DCR and DFW lands the state is seeking to re-certify under Forest Stewardship Council (FSC) rules. The Conservancy believes that carefully planned and implemented harvesting operations can be compatible with biodiversity conservation and social objectives. Independent third-party certification of forest management practices is a means to verify and improve such compatibility, and FSC is the only system that consistently meets the requirements set forth in the World Bank's 2002 Operational Policy on Forests. The Nature Conservancy has supported FSC certification of the Massachusetts DCR and DFW forest lands since first certified in 2004.

We appreciate the Commonwealth's continuing commitment to green certification and its effort to re-certify land for which FSC certification has expired. As part of this re-certification effort, DCR and DFW are required to justify which lands they will exclude from any re-certification, in order to comply with FSC Criterion 1.6, "Long-term commitment to adhere to FSC". It is our understanding that this is an FSC safeguard, designed to ensure that landowners do not game the system -- green certifying only those lands on which they plan to do responsible forest management, while excluding lands where they will continue to do harvesting that violates the rules of FSC.

DFW has provided clear justification for why they will not seek re-certification for properties that have been developed as boat ramps, are not forests, or are managed by the US Department of Defense. The lack of a rationale column (like that found in the DFW list) in DCR's list of excluded properties is an unfortunate oversight, especially since DCR is required to list *and explain* the reasons for excluding certain properties. We hope that DCR has used similar criteria in developing its own list, excluding land on which, for example, intensive development, swimming areas, or a lack of forest mean FSC oversight is not applicable. The Nature Conservancy continues to see a need for such oversight on most of the Commonwealth's forest lands and supports DCR and DFW's efforts to re-certify the majority of their land.

Sincerely,

Andy Finton
Director of Conservation Science
617-227-7017 x303
afinton@tnc.org



December 10, 2009

Forest Certification Comment
MassWildlife
1 Rabbit Hill Road
Westborough, MA 01581

Re: Public comments for State Wildlife Lands Re-Certification Effort

Dear Comment Administrator:

We at the Wildlife Management Institute (WMI) request that this letter be submitted into the public record for the State Wildlife Lands Re-Certification effort. Founded in 1911, WMI is a private, nonprofit, scientific and educational organization dedicated to the conservation, enhancement and professional management of North America's wildlife and other natural resources. WMI works to improve the professional foundation of wildlife management. It supports the wise use of wildlife, endorses the proposition of game management, the concept of biological diversity and principles of ecology.

The state of Massachusetts is to be commended for its effort to have the majority of public forest lands and wildlife management areas third party certified under the Forest Stewardship Council (FSC) standards. Being involved in this process underlies the commitment of the State of Massachusetts through its Department of Conservation and Recreation (DCR) and Division of Fisheries and Wildlife (DFW) to manage its natural resources to meet ecological, economic, social and cultural needs of its citizens. In addition, the staff of DFW has completed the inclusive *Massachusetts Wildlife Action Plan* as directed by the U.S. Congress. This exceptional 750 page document includes a list of Species of Greatest Conservation Need (SGCN). Twenty-one animal species with declining or vulnerable populations associated with young forests and shrublands have been identified as SGCN.

We support the emphasis of DFW on increasing regeneration cutting to meet landscape wildlife habitat goals. The *U.S. Forest Service Forest Inventory and Analysis* (2005) documents that there has been a long term decline in seedling and sapling forests in Massachusetts. Currently, young stands comprise only three percent of the forest in the state, whereas published wildlife researchers recommends that approximately twenty-five percent of a forest in New England should be in young size classes to support indigenous vertebrate wildlife populations. The data are clear. The forests of Massachusetts are getting older and the suite of wildlife species that utilize young forests are declining. Regeneration cutting by DFW and DCR should be encouraged to fulfill FSC Principle 6: Environmental Impact which states, in part, that "Forest management shall conserve biological diversity and its associated values...".

Sincerely,

Scot J. Williamson, VP
Wildlife Management Institute

4426 VT Route 215N
Cabot, VT 05647