

To whom it may concern:

I am a licensed consulting forester (#397) in Mass, though most of my business is in Vermont. I am recognized as an expert in Northern Hardwood silviculture by the US Forest Service, and was asked by the USFS to assist with the recent revisions to the Silvicultural Guide to Northern Hardwoods in the Northeast. I have other feathers in my cap, but suffice to say that I have worn out 30 pairs of boots as a forester.

First, I would draw your attention to serious flaws in the Manomet report, which I hope you are not giving credence to. I filed specific criticism, as have many others, which is on record.

Second, I draw your attention to a well prepared discussion of carbon accounting which fits the real-world of forest management better than the Manomet report:

[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.usabiomass.org\\_docs\\_Final-2520BPA-2520Khanna-2520Dwivedi-2520Biomass-2520Carbon-2520Study-2520May-25202017.pdf&d=DwlCaQ&c=IDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns\\_w&r=tf\\_ntgpNMRgBvDk529idd1sqMPgkwqlRDwfqRoylKNg&m=vmBn6WkZW6PUHfT1ukDQ3Ac3RpeUnRd0-TYxQcQgSg&s=e9Hu-PRsaZUgs1FYkFF1Zlv0Kr5adJKxmbWgraQUORI&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.usabiomass.org_docs_Final-2520BPA-2520Khanna-2520Dwivedi-2520Biomass-2520Carbon-2520Study-2520May-25202017.pdf&d=DwlCaQ&c=IDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=tf_ntgpNMRgBvDk529idd1sqMPgkwqlRDwfqRoylKNg&m=vmBn6WkZW6PUHfT1ukDQ3Ac3RpeUnRd0-TYxQcQgSg&s=e9Hu-PRsaZUgs1FYkFF1Zlv0Kr5adJKxmbWgraQUORI&e=)

Third, I point out that Massachusetts forests are in rough shape. While the drive by looks pretty nice from the highway, somewhere near a million cords of wood are dying and rotting in the forest every year. I have detailed numbers for Vermont, and your state is similar, but frankly in worse condition. Forests are generally overstocked, and crowded with many poor quality trees. This affects forest health, tree health, regeneration of desired species, age class imbalances, and species composition. The very best forestry being practiced in Massachusetts is where you have access to industrial scale biomass markets for electrical generation. With reduced markets for pulpwood throughout New England, and distance to remaining markets in Maine and New York, pulpwood is unprofitable to handle in most cases. Demand for other low-value wood (not suitable for lumber production) for firewood, pellets or small scale thermal chip burning are incidental to your forest growth rate. So, every year your forests are in worse shape since growth exceeds harvest. Your mortality rate has tripled, or worse in the last 30 years and it will continue to climb. Does anyone account for the carbon emission of your million cords of decay? Aggressive forest improvement is required to reverse that trend, and the problem was not created in one decade, and will not be solved in one decade. But it is still going in the wrong direction.

Fourth, any wood produced on Chapter 61 lands, or any approved harvest under Chapter 132 should be considered "sustainable" as an eligible renewable resource.

Respectfully yours, Robbo Holleran