

Comments Received by Department of Conservation and Recreation on Fiscal Year 26 Division of Water Supply Protection Forestry Management Projects

Comment #1

October 16, 2025

Ken Canfield

DCR Division of Water Supply Protection 578 Old Turnpike Rd
Oakham MA 01068

Mr. Canfield:

Thank you for your public outreach on forest management proposals for 2026 on Division of Water Supply Protection watershed lands, and for the opportunity to submit comments. We appreciate DWSP's openness, transparency, and willingness to gather public feedback about forest management work.

We also must compliment DWSP for its easy-to-navigate online map showing exactly where proposed forest management projects are located, with the ability to easily click on the project to get a link to the full project proposals. This use of technology appears to be more advanced than other state agencies are using, and it's very welcome.

We are also appreciative of DWSP's extremely detailed proposals for forest management. These clearly lay out the current conditions, including the mix of tree species and basal area; soil types and drainage; the age diversity and state of regeneration; the history of management projects in the area dating back more than half a century; descriptions of wildlife, wildlife habitat, and cultural resources on the site; careful explanation of how the projects impact climate change; and more. The silvicultural prescriptions are clearly described and easy for even those with no knowledge of forestry to understand.

We strongly support the forest management efforts of DWSP and we believe you have laid out strong justifications for this work in these proposals. Our thanks to you and your foresters for the significant amount of hard work that these proposals represent.

As is laid out in many of these proposals, moving to increase tree age and species diversity is proven by repeated scientific studies to increase the resilience of a forest to challenges from severe weather events, invasive insects and plants, and general stressors from climate change. There is also substantial evidence that a more resilient forest offers greater carbon sequestration rates and carbon storage over time as well.

Advocating for a Strong, Sustainable Forest Bioeconomy

Some of these projects are designed to address areas of the forest where there is little to no regeneration. Without growing young trees in the forest, a severe weather event could wipe out most or all mature trees, resulting in decades of recovery before a healthy forest filter forms again. In the meantime, this can result in runoff from heavy rains, with the potential of silting up streams, brooks, and ultimately the reservoirs themselves.

Regeneration can also be harmed by deer and moose browse. We were glad to see some discussion of the use of slash walls on select projects. These innovative structures – using the lowest-grade timber and smaller trees removed as part of the forest management project – are proven to protect regrowth from herbivory while providing shelter for small animals, attracting insects and other sources of food for birds and mammals, and restoring soil nutrients as they decompose and disappear over a period of years. They can do all this at a fraction of the cost of fencing – important at a time when the state is facing a recession and severe cutbacks in federal funding.

By managing to increase resilience, DWSP is protecting the forest filter from disruption and damage – ultimately protecting the award-winning water quality you offer to many communities throughout eastern Massachusetts, including the town where I live. Your clear care and concern for these forests is evident in your plans, and we greatly appreciate it.

As a benefit of these actions, DWSP is also growing the forest bioeconomy – supporting desperately-needed jobs in rural communities in timber harvesting and sawmill businesses (which has a measurable ripple effect on overall community economic growth) and producing low embodied carbon building materials for the Commonwealth's dire need for more housing production.

Thank you again for your commitment to listening to public feedback as you complete the forest management proposals for these properties, and for allowing us to share our thoughts.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Egan", with a stylized, cursive script.

Christopher Egan Executive Director

Comment #2

TO: Massachusetts Department of Conservation and Recreation

FROM: Massachusetts Sierra Club Forest Protection Team

DA: October 16, 2025

RE: Comments on the proposed Watershed Forestry Project Proposals for Fiscal Year 2026

The MA Sierra Club Forest Protection Team has reviewed the [DCR 2026 Watershed Forestry Project Proposals](#) and opposes all projects. In comparing these project summaries to those from previous years, we see the same overall strategies now framed in terms of "Climate Considerations." However, there is really nothing new. Harvest goals are still about fixing "age-class imbalance" and reducing older forests in order to increase the proportion of young forests and creating specific types of forests which need to be maintained by continuous harvesting and burning. At the same time, there is a dearth of information on the project summaries that can help the public visualize what is actually involved in the project. For example, there is no information on the species, number, age, size, and carbon content of the trees proposed for removal. How can even an informed public make responsible comments with so little information on each project? Moreover, there should be an opportunity for interested members of the public to visit each site to see first hand what is being proposed, and to hear from the foresters themselves just how the proposed work is supposed to enhance the water supply or further the public good more generally.

Another issue worth mentioning is the lack of concern for the kind and size of the equipment employed even though there is abundant evidence that compaction by heavy equipment harms roots and the rich community of soil organisms necessary for forest health. This is especially apparent in the hundreds of trips by heavy equipment that will be required to build the "slash walls" to reduce herbivory by deer and moose.

At the same time, we know that older forests have both higher carbon density and greater biodiversity than young managed forests, they regulate water quality and quantity more efficiently than younger forests,¹ and they are the most resilient. The forests of the Quabbin, Ware and Wachusett watersheds are ideal candidates to leave intact to become old growth of the future. The benefits of leaving them standing far outweigh the benefits of using them for production.

In particular, the forests in the watershed areas do not need active management in order to protect the water supply. This was clearly stated in the [Climate Forestry Committee \(CFC\) Report](#)². While there was some disagreement about the most appropriate lands to use for wood

¹ United States Forest Service, "Forests to Faucets." [Online]. Available: https://www.fs.usda.gov/ecosystemservices/FS_Efforts/forests2faucets.shtml

² "Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines," Jan. 2024. [Online]. Available: <https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download>

production, there was overall agreement “*that active forest management is **not necessary** to maintain an abundant and clean water supply*” (p.42). In other words, while responsible “climate-smart” logging may minimize harm compared to traditional methods of the past, it does not eliminate harm. The reasons provided in all of the Management Plan Summaries for logging in the watersheds are, in fact, not necessary for the health of the forest, for climate resilience or for habitat development.

The CFC report was also clear that we need to increase the percentage of Massachusetts forests that are classified as reserves and are permanently protected from logging. While the state has proposed purchasing private land for this purpose, the easiest, most efficient and cheapest way of doing this is to use the land that the state already owns and controls.

Finally, we would like to voice our skepticism about motives and transparency of these projects. Because the need to log forests for the good of the water supply is not supported, either in the literature or by our own experts, we are left believing that the true reason for logging in these areas is for wood production, as is currently allowed by law. Yet this is virtually never stated. The Sierra Club Forest Protection Team is not opposed to logging for wood products in general, particularly when it is done in a sustainable way and follows Best Management Practices. However, this does not need to be done on public land, particularly not on watershed land, which offers us the best opportunity to reserve large contiguous tracts of land where mature forests can become old, optimize carbon sequestration and storage, maximize water quality and quantify and increase wildlife habitats and uninterrupted corridors. To the public, framing harvests as good for the climate and/or forests health calls into question the integrity of state agencies. To increase transparency and trust in this regard, the CFC committee recommended that the state make clear the true motivations for tree harvests.

While agreeing that limited wood production can occur without adverse impact on the provision of abundant clean water, they prefer that this, rather than “resilience” be the stated management objective (p.41).

Until then, we cannot have an honest conversation about proposed projects and the public will continue to object to the ongoing logging on our lands.

We urge the state to withdraw these projects and any future harvests in the Quabbin, Ware and Wachusett watershed forests.

Respectfully,

Massachusetts Sierra Club Forest Protection Team

Comment #3

Forestry Lots 2025

I have reviewed the 2025 proposed forestry lots for the Quabbin Watershed and find that they appear to meet the general standards for forestry practices. However, I am surprised by the frequency and size of the proposed openings—some as large as six acres. This represents a more aggressive approach than has been used in the past and may generate public concern.

Although the proposals do not mention herbicide use, if glyphosate or other chemical herbicides are part of the treatment plan, I object to their use in the strongest possible terms.

During the presentation, I noted references to the influence of the Division of Fisheries and Wildlife in shaping habitat goals, but no comparable discussion of water quality considerations. It appears that the overall forestry program has shifted toward a wildlife management focus, rather than prioritizing the protection of water quality—the primary purpose of watershed management.

I would appreciate more information on measures to reduce erosion and to control the impacts of large timber-harvesting equipment, especially in relation to maintaining water quality.

Bill Pula, Pelham a Watershed Community

Comment #4

Submitted via email

TO: mass.parks@mass.gov., dan.clark@mass.gov

CC: Melissa.Hoffer@mass.gov, Stephanie.cooper@mass.gov,
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Nicole.Lachapelle@mass.gov, tom.oshea@mass.gov

TO: Massachusetts Department of Conservation and Recreation DA:
October 15, 2025

RE: Comments on the Watershed Forestry Project Proposals for Fiscal Year 2026

Thank you for providing this opportunity to comment on the Massachusetts Department of Conservation and Recreation (DCR) Watershed Forestry Project Proposals for Fiscal Year 2026. [<https://www.mass.gov/info-details/dcr-watershed-forestry-projects>]

We strongly oppose all 23 of these projects. DCR has not provided any credible scientific evidence that they are necessary or beneficial. Moreover, there is ample evidence that logging, prescribed burning, and other intensive management has negative environmental impacts, which include worsening climate change, fragmenting wildlife habitats, increasing soil erosion, degrading wetlands, releasing air and water pollution, and displacing nature-based recreation.

The three watersheds, Quabbin, Ware and Wachusett comprise 95,781 acres of land administered by the Department of Conservation and Recreation's Division of Water Supply Protection (DWSP). The proposed logging projects would affect approximately 1,195 acres of forest.

The history of the watershed lands is typical of many forested areas in Massachusetts. Approximately 85% of forests were cleared for agriculture by 1850, and as farms were abandoned, large areas of forest grew back. The public watersheds have the unique history of being acquired through eminent domain in the early 1900s to allow the creation of water supply reservoirs. Since then, the forests surrounding these reservoirs have been growing back — some for 100 years or more.

The management of Massachusetts public watersheds closely matches that of state forests. These forests have been managed according to the demands of competing interests — logging

for timber and forest products, public recreation, conservation to maintain forested areas and, in rare cases, preservation as wildlands. This “multiple- use” management has been actively implemented for many decades by state agencies, educational institutions, large land trusts, the timber and wood products industries, and their political allies.

In June 2023, the Healey Administration launched the Forests as Climate Solutions Initiative to assess the role of forests in addressing climate change and achieving net zero greenhouse gas emissions. As a part of this initiative, Governor Healey instituted a moratorium on logging on all state-owned lands — including public watershed forests. The purpose was to provide a pause in forest management to evaluate the role of forests in mitigating climate change and the climate impacts of current logging and other forest management practices.

The Governor also convened a 12-member Climate Forestry Committee (CFC) of experts to recommend new climate-oriented forest management guidelines. The report of this committee was issued in January 2024. [<https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download>]

All 23 of the 2026 Watershed Forestry Proposals include identical or similar claims regarding the need for, and benefits of, logging, burning, and other intensive management on these public watershed lands. All of the proposals contend in similar terms that they are “climate smart” and will help to make the forests more resilient and diverse to address climate change.

Again, the management goals and prescriptions in these proposals are essentially the same as those for state forests. Moreover, as with state forest management plans, the claims of need, benefits, and management treatments are largely inconsistent with the findings and conclusions in the CFC report as well as with credible peer-reviewed science. The following provides a sample of these inconsistencies.

DCR STATEMENTS, CFC REPORT RECOMMENDATIONS, OUR COMMENTS

1. *Forest Resilience and Water Quality*

DCR Statements:

“DWSP Foresters design timber harvests that will regenerate about 1% of the managed forest every year so that gradually, over time, the managed forest will include a much broader range of age classes than is currently present. Simultaneously, large unmanaged stands of trees are left to grow to biological maturities ranging from 100 to 400 or more years of age.

“The overall purpose of this management is to restore the forest to more balanced proportions of young, mid-aged, and older trees comprised of the greatest possible variety of native species. DWSP's working hypothesis is that the new makeup of the forest will help ease the damage caused by inevitable future severe weather events, outbreaks of disease, and insect infestations....

“By 2055, the outcome will be a diverse, actively reproducing, multi-layered watershed protection forest that is more resistant and resilient than what we have today.”

[<https://www.mass.gov/info-details/dcr-watershed-forestry-program>]

“This 36-acre forest is part of original land that was taken at the time of reservoir construction. Forests provide exceptional water quality protection and yield high quality water. Active forest management can increase the resistance and resilience of these watershed protection forests to disturbance by deliberately diversifying forest age structure and species composition.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-wa-26-77/download>]

“The primary goal of harvesting on the watershed is to create and maintain a forest that is resilient to and can quickly recover from small and large scale disturbances such as diseases, insect infestations, ice storms and hurricanes, all of which are becoming increasingly common. The ideal way to achieve this is to have a diversity of species in various stages of development (seedlings through large legacy trees) that are actively growing and regenerating. This combination of structural and species diversity builds resistance and resilience into the forest.” [<https://www.mass.gov/doc/dwsp-permit-3144-0/download>]

“The goal is to increase forest resilience by increasing vertical structure diversity while maintaining or improving the diversity of species composition across the landscape.

The prescribed treatment will provide sunlight, ground disturbance and growing space to release and establish a mixture of hardwood seedlings and saplings that are better suited to the site.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-wr-26-5/download>]

“Advantages of partial overstory removals include, but not limited to:

- Partial cutting retains carbon on the landscape for extended periods while regeneration develops.*
- Reducing competition for resources improves growth and carbon sequestration rates on residual trees.*
- Promotion of a diversity of age classes enhances overall forest resiliency.*
- Maintenance of continuous forest corridors provides for wildlife habitat.*
- As part of a regeneration system this method can be used to help guide species diversity towards more future-adapted mixes.”* [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-ns-26-06/download>]

CFC Report:

“The [DCR] Division [of Water Supply Protection] acknowledged to the Committee that active forest management is not necessary to maintain an abundant and clean water supply.” [p.42]

“[Some] Committee members argued that abundant ecosystem science shows that there is no reason for the Division [of Water Supply Protection] to actively manage forest land to produce clean water. They argue that forest development and natural disturbances will lead to increasingly diverse structure to these forests and that the benefit of future old-growth forests is great. While agreeing that limited wood production can occur without adverse impact on the provision of abundant clean water, they prefer that this, rather than ‘resilience’ be the stated management objective. A few also argued that active management should not occur at all given the carbon density of land managed by

Watershed Division around the Quabbin Reservoir (see Figure 2) and the need to sequester and store more carbon to address climate change.... [p.41-42]

Our Comments:

DCR claims that logging and burning in watersheds creates a “protection forest” and justifies this intensive management as a “working hypothesis.” However, there is no equivalent unlogged watershed to compare whether this hypothesis is valid or erroneous. Instead, this is an uncontrolled experiment that is causing major impacts on watersheds with no credible, peer-reviewed scientific evidence that it is necessary or beneficial. Indeed, the CFC reports that DCR staff admitted that “active forest management is not necessary to maintain an abundant and clean water supply.”

DCR needs to explain why the U.S. Forest Service’s “Forests to Faucets” reports rate the “Quabbin-East Branch Swift River” watershed only 73 out of 100 for “ability to produce clean water.” This “protection forest” is rated considerably lower than some other areas in the Northeast — including in some parts of New York’s Adirondacks and Catskills — which are protected preserves rather than intensively managed landscapes such as the DCR watersheds. [https://usfs.maps.arcgis.com/apps/webappviewer/index.html?id=4df9966dae614913afb719b617d3eddb&query=F2FDataset_PWS_hosted_20200821_AppView_5560%2CHUC12%2C010802040106]

Better yet, DCR should end this unnecessary and harmful experiment and protect all watershed forests as reserves that have the resistance and resiliency provided by natural forests.

2. “Climate-smart” Forestry

DCR Statements:

“DWSP has determined that the decision to implement this project is consistent with EEA climate goals and guidelines and agency land management objectives. Climate change considerations specific to the activities proposed for this project are discussed below.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-wr-26-45/download>]

“Harvesting in patches aligns with many climate-smart forestry practices: • Increasing structural diversity improves resiliency by reducing the impact of age/size related disturbances. • Extending regeneration periods minimizes short term impacts to groundwater and nutrient cycling. • Partial stand overstory removals more closely align with natural disturbance patterns. • More carbon is left on the landscape for longer periods, and within patch live tree, snag, and coarse debris retention allow for development of old forest characteristics. • Can also be used as opportunities to increase the stocking of future climate adapted species, current climate imperiled species, or other types of desirable vegetation.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-wr-26-5/download>]

“Although most often used in Massachusetts for open habitat maintenance, prescribed burning is also used within oak forests in Massachusetts and elsewhere for silvicultural purposes. Fire rapidly converts a fraction of a forest’s stored organic carbon into other forms including CO₂ but carefully applied use of low intensity fire offers great payback
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value in trade for this minor loss. Prescribed fire can: • prepare a site for reforestation, • discourage invasive species, • and encourage native tree regeneration better adapted to fire regimes, particularly oak and hickory. Forest stands treated with periodic light burning exhibit reduced biomass losses in the event of a wildfire, generally have more resistance to pathogens, and should be more resilient under climate scenarios that anticipate more frequent drought facilitated fires.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-ha-26-01-02/download>]

CFC Report:

“Unsurprisingly, disturbing the forests of Massachusetts as little as possible and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health.” [p.4]

“The Committee generally agreed that passive management confers greater increases in carbon stocks than active, and that allowing forests to grow and age is typically best to maximize carbon storage.” [p.6]

“They concluded that the most important way to preserve soil carbon is to allow forests to mature naturally..... ” [p.6]

Our Comments:

The claim that logging and prescribed burning maintains and increases forest resilience and carbon sequestration and storage is not based on credible science. Instead, there is ample evidence that this intensive management rapidly releases most of the carbon in trees and other vegetation, fragments habitats, spreads invasive species, erodes soils, degrades wetlands, and releases air and water pollution. In addition, burning produces toxic smoke that threatens wildlife and humans. As the CFC concludes, the best way to “maximize carbon, ecological integrity, and soil health” is to leave the forest alone. DCR should follow the committee’s guidance and allow watershed forests to “mature naturally.”

3. Reserves

DCR Statements:

NOTE: There is no mention of protecting or expanding reserves in the DCR Watershed Forestry Program plan or in any of the individual forest management project proposals.

CFC Report:

“Expand the number and size of reserves, potentially to 10% of Massachusetts forests conserved and managed as reserves, a level consistent with the Wildlands, Woodlands, Farmlands, and Communities goal.... Some Committee members suggested 30%, citing IPCC recommendations regarding climate and biodiversity.”

“Codify reserves on state land to provide a higher level of protection than the administrative designation that currently applies.” [p.48]

“As before, designate and manage some of the most biologically productive forests as reserves to prioritize carbon accumulation (and realize other important objectives like the provision of mature forest habitat) and others as parklands and woodlands.

“Consider the existing density of carbon on the landscape as part of an effort to designate reserves that will ‘maintain the ecological integrity and biodiversity that will accumulate and store the most carbon.’

“The CFC recognizes that establishing reserves advances multiple land management objectives including carbon sequestration and provision of old growth forest habitat.” [p. 49]

Our Comments:

In 2024, the “DCR Watershed Forestry Program” web page claimed that more than 20,000 acres of DWSP watershed lands were “set aside in large and small Reserves.” [<https://web.archive.org/web/20240212084235/https://www.mass.gov/info-details/dcr-watershed-forestry-program>]. However, the agency did not provide a list of these areas, a map to locate them, or guidelines to ensure their protection and management. In 2025, this reference has been deleted from the web page. This lack of transparency is unacceptable and the agency needs to provide full and accurate information on the location, management, and long-term integrity of all reserves — or if it has not designated any reserves, explain this failure to the public.

4. Fire

DCR Statements:

“The goal of this proposal is to restore a mosaic of fire adapted communities at the site, as specified in the 2017 Land Management Plan. The lower spillway has historically been and is currently being maintained free of woody vegetation using prescribed fire. The associated habitat benefits of that infrastructure management will be further enhanced by expanding fire adapted community types to the east and west. This type of management is a small part of DWSP’s overall management but is important to DWSP’s goal of maintaining and enhancing overall biodiversity on the landscape.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-ha-26-01-01/download>]

“General Climate Change Considerations: The proposed silvicultural approach is designed to restore and maintain a fire-adapted forest community, enhancing ecological resilience and biodiversity across a landscape historically influenced by fire. Fire-maintained systems reduce fuel loads, helping mitigate wildfire risk under future climate regimes. This effort aligns with DWSP’s broader biodiversity goals by enhancing habitat for specialized flora and fauna and increasing structural and compositional diversity across the landscape.” [<https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-ha-26-01-01/download>]

“Prescribed Fire is the planned use of fire in a particular place and time, under established conditions and safety requirements to accomplish resource management goals. Prescribed fire improves habitat for a variety of wildlife and native plants, including roughly 40% of the state listed terrestrial species, and restores natural communities dependent on fire. • In fire-influenced natural communities, fragmentation of the landscape and the suppression of fires (prescribed or natural) leads to accumulation of volatile hazardous fuels in the surface, mid-story, and canopy vegetation layers. • Excessive vegetation density negatively impacts the habitat quality of the natural community and may eventually lead to fuel buildup and unplanned, catastrophic wildfire. • Prescribed fires that reflect natural return intervals increase belowground carbon storage and sequestration. The consequences of catastrophic wildfires include: • The release of large amounts of carbon including soil carbon. • Tree mortality. • Severe soil, duff, and below ground vegetation impacts. • Potential alteration of soil chemistry. • Threats to firefighter safety, human communities, and property damage. • Threats to human health from severe smoke impacts both locally and potentially at long distances.” [https://www.mass.gov/doc/dcr-dwsp-forestry- proposal-ha-26-01-01/download]

“Standing dead trees will be removed throughout the proposal to facilitate the application of prescribed post-harvest fire.” [https://www.mass.gov/doc/dcr-dwsp-forestry-proposal-ha-26-01-01/download]

CFC Report:

“The CFC recommends establishing habitat goals that place less emphasis on early successional [i.e., young forest] habitat and more emphasis on late successional habitat and the development of old-growth forest characteristics.

“Increase the goal for late successional and old-growth habitat, which is associated with carbon storage and is greatly underrepresented on the landscape compared to the historic amount.

“Reduce the goal for early successional habitat (e.g., grasslands, shrublands, young forests) given the current goal’s carbon implications, which include foregoing the climate benefit of sequestration by continually maintaining land as grassland or another early successional habitat.” [p. 28]

NOTE: The CFC did not raise concerns about a significant threat from forest fires, nor did it recommend — or even mention — the use of prescribed fire for forest management or wildlife habitat.

Our Comments:

DCR has dramatically increased the use of forest thinning, prescribed burning, mowing, and herbicide use, purportedly to 1) reduce the risk and intensity of forest fires and to 2) provide habitat for rare and endangered species. This has expanded the amount of early-successional habitats across DCR lands.

However, as noted, the CFC did not raise concerns about a significant threat from forest fires, nor did it recommend the use of prescribed fire for forest management or

creating early-successional wildlife habitat. Moreover, the CFC report noted that there is no shortage of such habitats in Massachusetts, while there is a shortage of mature and old-growth forest habitats.

The logging, burning, and other intensive management being done on watershed forests is fragmenting or removing mature forests that would become old-growth habitats if left to grow through proforestation and achieve their full ecological potential. Moreover, there is credible scientific evidence that this intensive management could actually increase the risk and severity of large fires.

DCR should follow the CFC recommendations and significantly increase the goal for late-successional and old-growth habitat. The best way to do this is to halt its logging and burning programs and protect these forests as reserves.

5. Cumulative Impacts of Logging in Watersheds

DCR Statements:

“DWSP Foresters design timber harvests that will regenerate about 1% of the managed forest every year so that gradually, over time, the managed forest will include a much broader range of age classes than is currently present. [https://www.mass.gov/info-details/dcr-watershed-forestry-program]

“More than 1,000 timber harvests have been conducted over the last 50 years on DWSP lands, and our monitoring has shown no decreases in water quality related to these harvests. The DWSP water supply remains among the cleanest and purest in the world.” [https://www.mass.gov/info-details/dcr-watershed-forestry-program]

CFC Report:

“DCR DWSP holds over 96,000 acres of forest land and has harvested an average of 524 acres annually (0.54%) since 2006. Within the Quabbin and Ware River watersheds harvesting removed the equivalent of approximately 24% of growth from 2001 to 2020.” [p. 19]

Our Comments:

DCR gives the public the impression that only a small amount of watershed forests is logged by failing to mention or assess the major cumulative impacts of ongoing annual logging. At least 10% of the Quabbin and Ware River watersheds have been logged since 2006 and at least 24% of timber volume has been removed since 2001, much of this through “patch” clearcutting. This no doubt has significant impacts, such as carbon release, forest fragmentation, spread of invasive species, and other damage. At the current rate of logging, the vast majority of these watersheds could be logged over the next 100 years or less, leaving virtually no trees older than 100 years of age. Yet individual logging projects are planned without consideration of their cumulative impacts. Indeed, as noted above, the Forests to Faucets reports indicate that water quality in these watersheds may be lower than in watersheds that are protected from logging and other active management.

Watershed logging over many decades has fragmented habitats, degraded soils, spread invasive species, polluted air and water, and displaced nature-based recreation. There is a lack of a credible scientific basis for such logging and a lack of any comprehensive, landscape-scale assessment of the cumulative impacts of these activities. DCR should halt this program immediately and protect all public watersheds as reserves.

CONCLUSION

For all the reasons cited above, we are calling on DCR/DWSP, EEA, and the Healey Administration to end the watershed logging program and declare the Quabbin, Ware, and Wachusett watersheds as permanently protected reserves, with protection standards similar to our National Parks and the Adirondack and Catskill preserves in upstate New York — which are vital watersheds for New York City.

References

Executive Office of Energy and Environmental Affairs (January 3, 2024). Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines. <https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download>

Sincerely,

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Meg Sheehan, Executive Director
Community Land and Water Coalition
Plymouth, MA

Carissa Sinclair
Concerned Citizens of Franklin County
South Deerfield, MA

Comment #5

"Comments on Quabbin proposed forestry lots:

* Public walk was publicized only on the DCR-DWSP website, therefore interested people were unaware of the public walk and missed the opportunity to speak with foresters, ask questions and view whatever lot the forester is permitted to show.

* Having missed the public walk, I chose to view a proposed lot in Petersham on my own. The lot like all the other proposed lots has not been marked yet so it is impossible to know what trees are going to be harvested and what the actual forestry operation will entail. The forester's lot description does not convey this information. This particular lot has several historically designated exceptional oak stands from a 1964 report. There is no mention of this in the forester's report. Will these oak stands be protected from harvesting and damage from equipment? How will the existing oak regeneration be protected from soil compaction and skid trail damage? The public is not allowed to view marked lots or active forestry operations, therefore we cannot know what will actually happen on these proposed lots.

* If forestry operations on public watershed lands is actually necessary to protect water quality, adequate public education must be improved. Third party oversight (recertifying through green certification) can provide the transparency, accountability and public feedback that is currently missing in DCR-DWSP forestry operations.

* DCR-DWSP's web site is complex due to the large amount of information included. The watershed forestry maps are designed for foresters who are familiar with the watershed. The vast amount of acreage, gates and roads make it nearly impossible to find the lots shown on the maps without assistance from foresters or rangers. Proposed and completed lots on the Prescott Peninsula are always closed to the public. Other lots in the watershed often require miles of walking which is difficult for elderly people.

* True transparency is needed."

Lexi Dewey

Pelham Massachusetts 01002

Comment #6

"I am submitting comments related to FY 2026 forest Proposal WA 26-78. Specifically, I am questioning why DWSP would consider logging an area that is right next to the Wachusett Reservoir. How is disturbing the such an area going to prevent harm to the water quality of the reservoir? Much of this land is well-drained soil, which will leach to the reservoir once logged. This seems so counter to DWSP's mission to maintain the water quality of the Quabbin, Ware, and Wachusett Reservoir system. Further, the silviculture goals - creating tree age diversity, climate resiliency, etc. - appear to be a justification for logging valuable 100 plus year old trees in the parcel. Finally, all of the parcel is classified as a MA NHESP habitat, but there are no details on how this would be protected, just boilerplate language to consult and follow the program's guidance & recommendations.

For these reasons, I am against this logging proposal."

John Hirst

Feeding Hills Massachusetts 01030

Comment #7

"I am submitting comments related to FY 2026 forest Proposal WA 26-77. Specifically, I am questioning why DWSP would consider logging an area that is right next to the Wachusett Reservoir. How is disturbing the such an area going to prevent harm to the water quality of the reservoir? Much of this land is well-drained soil, which will leach to the reservoir once logged. This seems so counter to DWSP's mission to maintain the water quality of the Quabbin, Ware, and Wachusett Reservoir system. Further, the silviculture goals appear to be a justification for logging valuable 100 plus year old trees in the parcel. Finally, a significant portion of the parcel, 1/3, is classified as a MA NHESP habitat, but there are no details on how this would be protected, just boilerplate language to consult and follow the program's guidance.

For these reasons, I am against this logging proposal."

John Hirst

Feeding Hills Massachusetts 01030

Comment #8

"I am opposed to the DWSP logging proposals, because older intact forests preserved as wildlands provide habitat for vast numbers of woodland species, including many that have been declining over the decades.

Forest degradation due to active forest management (i.e. logging) was a primary cause of bird species decline, according to an article in Nature Ecology & Evolution (Betts et al., 2022). In the first large landscape scale study of the impact of forest management on bird populations, researchers said, "...we found substantial reductions in old forest as a result of frequent clear-cutting and a broad-scale transformation to intensified forestry." While the 54 birds examined are from Eastern Canada, the majority of them also nest, winter, or migrate through Massachusetts. The authors conclude that "If maintaining non-declining populations of forest birds is the goal, conservation measures that halt the alteration of habitat, particularly in diverse, older forests, will be necessary." We need to protect the diverse older forests in the Quabbin, Ware, and Wachusett watersheds.

Seventy two percent of 54 species that were studied showed significant population declines, and only 3 species showed population increases. Some of the largest population losses were for the Blackburnian warbler and the Golden-crowned Kinglet, species that need mature forests.

To make matters worse, heavy equipment, such as a 40-ton feller-buncher, damages soil microorganisms, fungal networks, tree roots, and even vertebrates by crushing them as they hide beneath the soil in the winter. Historically, logging operations were conducted in the winter

to take advantage of frozen ground. Now with climate change, the ground is softening and soil compaction and creation of ruts and runoff are routine.

It is time for State agencies to stop ignoring climate and biodiversity warning signs."

Roy Lane

Sterling Massachusetts 01564

Comment #9

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of "climate-smart forestry." It does not address impacts to any individual projects. How can the state claim carbon benefits when there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest's current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Laurie Lane

Sterling Massachusetts 01564

Comment #10

"I am opposed to the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed.

Other areas are part of continuing rotations of cutting that mean the forest can never mature.

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. If the details missing from these summaries are in the plans themselves, where are these available to the public? There is no mention of third-party monitoring or impartial audits of past or ongoing activities. Patch cutting has been going on for at least 10 years, so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas.

On the CFC there was a clear tension between proforestation thinking and conservation forestry adherents. These plans show only the forestry approach, allowing ongoing active management. Referring to logging events as “harvests” is a clear indication of the intent to keep forests producing a crop rather than treating them as a protected ecosystem.”

Jeremy Lane
Sterling Massachusetts 01564

Comment #11

"I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations. The way to maximize the many benefits forests provide is to set them aside as forever wild."

Kenneth McDonnell
Holden Massachusetts 01520

Comment #12

"I am opposed to the DWSP logging proposals because they are a lazy and short-sighted solution to market demands, not scientifically-backed choices that reflect our communities' values.

Studies show that INTACT old-growth forests (1) provide critical habitat to many species - especially birds which are threatened by climate change and habitat destruction (e.g. Blackburnian Warblers and Golden-crowned kinglets), (2) sequester more carbon than "actively managed" (i.e. logged) forests, (3) avoid erosion caused by equipment activity and loss of root systems holding soil together.

Market demands might make it seem like a good idea to open up critical forests and watersheds for logging and other development, but this simply postpones the problem of the innovation and investment that we will inevitably need to increasing populations and dwindling natural resources. When we finally face the music, we can't snap our fingers and bring back the oldest and most productive ecosystems that we sacrificed on the alter of immediate gratification of market demands that DO NOT have the long-term health and resilience of Massachusetts communities in mind.

Come on, Massachusetts State agencies, do better."

Marta Faulkner

Cambridge Massachusetts 02138

Comment #13

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of "climate-smart forestry." It does not address impacts to any individual projects.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Stephen Reuys
Newton Massachusetts 02459

Comment #14

"Lot PR-26-23 This old late successional stand of w. pine, oak species and hemlock has been lightly harvested in the past. This proposed heavy cut removing up to 70% of the overstory and most of the understory is drastic, especially cutting all tall pines. Moose and deer browse is presently severe on hemlock and oak in the interior. Without reductions in the moose population, regeneration of favored oaks will fail. Need age, height, and range of diameters of this forest. Do not cut.

Lot PR-26-14B A slash wall of undetermined size is proposed. This is hard on the soils due to compaction from concentrated use of large heavy equipment to build a wall 20' deep and 10'tall. The slash wall process needs to be brought before the public before going forward. Do not go forward on this lot

Lot 26-10 Another slash wall is proposed and also thinning of 44 acres, something that is not common. What type of machinery will be allowed in the thinning? Recent thinning in a Timber Sale in Gate 31 showed major impact to soils. Do not cut until answer to this question.

PR-26-24 Again what type of equipment is being allowed in the 56 acre shelterwood. Large heavy equipment is not suitable in partial cut shelterwoods. Do not go forward until this is answered.

PT-26-8 In 1964 MDC Forester Fred Hunt collected data on this stand, because at that time it was exceptional to other stands. It has continue to grow and now has white pine trees over 40' in diameter and well over 100' tall. It should have exceptional status and should not be cut,, even in small patches. Restore to exceptional status and do not cut.

PT-26-9 This is an unusual stand of primarily white pine and hemlock. It is tall and thick with no regeneration. Pine is emerging above the hemlocks and considered a tall pine. Past history has been minor and important information like age is unknown. I believe that any openings will destabilize the stand and it will fall apart. Option, light thinning or do nothing."

Bruce Spencer
New Salem Massachusetts 01355

Comment #15

"I am opposed to all logging in the 2026 DWSP forest plans because logging is antithetical to carbon sequestration, the importance of which cannot be understated. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. The growing

consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. In fact, they will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations. The way to maximize the many benefits forests provide is to set them aside as forever wild."

David Greenberg

Colrain Massachusetts 01340

Comment #16

"The primary purpose of the watershed forests is to purify the drinking water in the reservoirs. Carbon sequestration is also a very important ecosystem service provided by these forests, especially considering the Commonwealth's goal of net-zero by 2050.

The MWRA watershed forests should be thinned, not clear cut. Many saplings and young trees of diverse species should be left behind to regenerate a multi-age, diverse forest as promised in the signs that DCR posts around the watershed. When all the trees are removed, moose and deer eat all the seedlings and prevent regeneration.

Many patches of Quabbin forest that were harvested years ago have only thickets of small, even-aged black birch sprouts and a few small white pines here and there. Young oaks are hard to find because oak sprouts are preferred by moose and deer."

Paul Lauenstein

Sharon Massachusetts 02067

Comment #17

"I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of

trees, which is roughly the same harvest rate as previous years. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations.

The way to maximize the many benefits forests provide is to set them aside as forever wild."

Lois Tow

Boston Massachusetts 02130

Comment #18

"I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection.

Massachusetts should continue to set a high mark for responsible interaction and stewardship of its environmental resources. Adding trees, investing in solar power and wind power, these are the hallmarks of a government committed to preparation for increased climate change, and with a vision to reorient our consumption to make the problems better and not worse."

Matt Chapuran

Roslindale Massachusetts 02131

Comment #19

Stop cutting our forests. We need old growth forests for future generations. Stop being money hungry.

JOHN WOJDAK

BROOKFIELD Massachusetts 01506-0894

Comment #20

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Carol Walker

Winthrop Massachusetts 02152

Comment #21

Please do not log our protected, public and precious forests and landed. Leave it alone I beg you.

Katherine May

Templeton Massachusetts 01468

Comment #22

"To whom it may concern,

I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

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Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs.

Thank you for your consideration."

Maggie Shields
Sterling Massachusetts 01564

Comment #23

"I am opposed to the DWSP logging proposals, because older intact forests preserved as wildlands provide habitat for vast numbers of woodland species, including many that have been declining over the decades.

Forest degradation due to logging was a primary cause of bird species decline, according to an article in Nature Ecology & Evolution (Betts et al., 2022). In the first large landscape scale study of the impact of forest management on bird populations, researchers said, "...we found

substantial reductions in old forest as a result of frequent clear-cutting and a broad-scale transformation to intensified forestry.” While the 54 birds examined are from Eastern Canada, the majority of them also nest, winter, or migrate through Massachusetts. The authors conclude that “If maintaining non-declining populations of forest birds is the goal, conservation measures that halt the alteration of habitat, particularly in diverse, older forests, will be necessary.” We need to protect the diverse older forests in the Quabbin, Ware, and Wachusett watersheds.

Seventy two percent of 54 species that were studied showed significant population declines, and only 3 species showed population increases. Some of the largest population losses were for the Blackburnian warbler and the Golden-crowned Kinglet, species that need mature forests.

To make matters worse, heavy equipment, such as a 40-ton feller buncher, damages soil microorganisms, fungal networks, tree roots, and even vertebrates by crushing them as they hide beneath the soil in the winter. Historically, logging operations were conducted in the winter to take advantage of frozen ground. Now with climate change, the ground is softening and soil compaction and creation of ruts and runoff are routine.

It is time for State agencies to stop ignoring climate and biodiversity warning signs. Massachusetts should be a climate leader - time is running out."

Margaret McGinnis
Hull Massachusetts 02045

Comment #24

I oppose all logging in the 2026 DWSP forest plans because logging only increases the rate of climate change despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Nancy Thomas
Amesbury Massachusetts 01913

Comment #25

"I am writing to express my opposition to the proposed cutting of around approximately 1,200 acres of state forests around the Quabbin, Ware, and Wachusett watersheds. It is more and more understood that a forest is the heart of an ecosystem that protects the air we breathe, the species it harbors, and the food and water we consume. There is no match between the upside and the downside to disturbing the forest surrounding the Quabbin, Wachusett, and Ware watersheds. There has been no proven upside, other than economic, which although important,

is not as impactful as the downside, which includes habitat loss for various species, loss of carbon sequester from the trees, and the disturbing of the dirt ecosystem and tree roots from the heavy equipment.

Please take my opinion into consideration."

Lucie Burke

MARBLEHEAD Massachusetts 01945

Comment #26

"Once again, we need our state forests and state lands to be reserved as wild, with no commercial logging permitted. The state has no control over what happens to private land. It can help preserve private lands by giving incentives to land owners to make the decision to preserve their lands for the good of our planet, but has failed to do that so far. The state has complete control over what happens to our public lands and needs to make the decision immediately to preserve our lands for the better good of all. The public has been asking for this for years and we ask that our legislators please make the decision to pass these bills in order to accomplish this important task. There is little resistance to passing these bills from the public. The resistance comes from the forestry industry itself, which does not want to give up its financial benefits of using our public lands for its own profit -making endeavors. The jobs that will be lost from the forestry industry can be transitioned to ones that support and educate natural solutions including teaching the public about climate solutions and the importance of our natural environment. We need our forests for so many reasons including mental health, environmental integrity, the water cycle, biodiversity, healthy soils, clean water and air and so much more. Please pass these bills this session.

Thank you,

Mike and Miriam Kurland

Williamsburg, Ma, 01096

Comment #27

"I recently went for a walk at the Quabbin Reservoir expecting a nice cool walk in the shade. I was astounded to discover that shade no longer existed because the area around Goodnough Dyke had been logged and totally destroyed because they wanted to create a grassland that never existed in the area to begin with.

I am heartbroken that the state has decided to continue logging at Quabbin and places the interests of Boston over impacts to health climate at this end of the state.

Please stop logging out precious state forests."

Martha Jorz
Amherst Massachusetts 01002

Comment #28

I am opposed to all logging in the Quabbin watersheds and elsewhere. There is no excuse for it based on any scientific evidence. Logging will destroy the balance and equilibrium of the forest with its heavy machinery, destruction of old growth trees and horrendous noise. It will also adversely affect the Reservoir, not to mention destruction of wildlife.

NATALIE GRIGG
Boxford Massachusetts 01921

Comment #29

"We truly oppose all 24 FY26 DWSP cutting projects due to their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is designed as if it is project specific, however it instead contains Public relations generated descriptions of so-called "climate-smart forestry." Nowhere does it address impacts to any particular project. The state should require an inventory of the forest's current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Enviro Show
Florence Massachusetts 01062

Comment #30

We love hiking, camping, and wildlife protected in our forests and on our public lands. Our forests and wildlife they support are irreparable and part of the breath of our planet and to be enjoyed for generations to come. We want our forests protected and not logged!!!!

Sarah Stewart

Watertown Massachusetts 02472

Comment #31

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of "climate-smart forestry." It does not address impacts to any individual projects. How can the state claim carbon benefits when there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest's current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Walter Gotham

Haverhill Massachusetts 01835

Comment #32

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity

protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Ann Walsh

Dorchester Center Massachusetts 02124

Comment #33

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides,

including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Yahara Katzeff

Turners Falls Massachusetts 01376

Comment #34

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

In addition to the effects of the loss of mature trees would cause, an important concern is the negative effects of the logging process using heavy equipment for timber extraction. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It seems clear that timber harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance.

Despite claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs. Passive management without logging is clearly the best choice for the forests and our water supply."

Robert Husson

Brookline Massachusetts 02445

Comment #35

I. am taking a Bio4Diversity online Biodiversity 13 course on Fungi, Forests and Rivers which uses & quote's a River Alive's as a text book. Water vapor is an important. component of atmospheric heating and can be diminished by intact forests and nature based climate change solutions.

I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest

protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations. The way to maximize the many benefits forests provide is to set them aside as forever wild.

David Dow
Falmouth Massachusetts 02540

Comment #36

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of “climate-smart forestry.” It does not address impacts to any individual projects. How can the state claim carbon benefits when there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest’s current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee’s Recommendations made by the panel’s scientists. For example, there is no evidence that logging improves a forest’s resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. “Extending regeneration periods,” harvesting to increase “resilience” or to “align with natural disturbances” may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. “Climate smart forestry” may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests.

Thank you for your consideration."

Bonnie Brouillet
Plymouth Massachusetts 02360

Comment #37

Public watersheds are protected from industry and can be a place for forests and wildlife. The trees prevent erosion by holding soil in place, which can help keep our water clean. Wildlife that lives in the forest has not been shown to cause problems with reservoirs either. However, with roads and trucks and industry, pollution will likely follow. Our planet is in need of more forested areas to take in carbon dioxide and put out oxygen. The watershed areas are already protected so it would only be a small step to allow trees to thrive there. That isn't going to happen if we continue to allow logging. I live in an area that gets water from the Quabbin and I trust the science that says trees will not contaminate it. Please help our planet by putting a stop to logging on public watersheds.

Katherine Plosky
Winchester Massachusetts 01890

Comment #38

With the Trump administration removing the long-standing protections against pollution for the nation's water supply, it is especially disheartening to see that the Commonwealth is considering allowing tree harvesting within the Quabbin watershed. It has been well established that forests protect water in countless ways: among them by anchoring the soil around a water source so it doesn't runoff into that water and by lowering the temperature (yes!) of its surroundings, thus protecting the water from excess evaporation. Forests also increase the amount of moisture that remains in the air around them, thus again helping to produce rain within themselves and their environment, i.e., for the lakes or rivers they abut. There comes a point at which the Commonwealth has to stop looking at new ways to raise revenues and start prioritizing the health of the environment. Any short-term gains from the sale of our forests will be negatively offset in spades in years to come. Penny wise and pound foolish, as the saying goes!

Louise Amyot
Greenfield Massachusetts 01301

Comment #39

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity

protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Tim Hill

North Dighton Massachusetts 02764

Comment #40

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

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including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Martin Omasta

North Hatfield Massachusetts 01066

Comment #41

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of "climate-smart forestry." It does not address impacts to any individual projects. How can the state claim carbon benefits when there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest's current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Peter Kahigian

Haverhill Massachusetts 01832

Comment #42

"I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. Logging decreases carbon

storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations. The way to maximize the many benefits forests provide is to set them aside as forever wild.

Thank you for your consideration."

Kurt Hirschenhofer
Millis Massachusetts 02054

Comment #43

"In this time of climate crisis - please do not log in the watershed

This weekend I am taking my children ages 7, 10, 13 to plant a mini forest at Belmont high school - teaching them to support life. We are interdependent beings. In a time where so much is being destroyed lets leave this - lets support the forest - lets leave a better world for our children. Lets create hope right now and support wildlife and sequester carbon."

Adrienne Allen
Belmont Massachusetts 02478

Comment #44

"I oppose the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left *unmanaged* and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some of the plans call for cutting “patches” in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

These plans mention climate and biodiversity enhancement but have no details. What is the

baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. Are these details missing from these summaries in the plans themselves? If so where are these available to the public? Patch cutting has been going on for at least 10 years so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas.

On the CFC there was a clear tension between proforestation thinking and conservation forestry adherents. These plans show only the forestry approach, allowing ongoing active management. Referring to logging events as “harvests” is a clear indication of the intent to keep forests producing a crop rather than treating them as a protected ecosystem.”

Dan Franklin
Melrose Massachusetts 02176

Comment #45

Please stop logging out state lands.

Miriam And Mike Kurland
Williamsburg Massachusetts 01096

Comment #46

Please preserve our nature and the fragile habitats they create.

Jennifer Sahady
Upton Massachusetts 01568

Comment #47

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of “climate-smart forestry.” It does not address impacts to any individual projects. How can the state claim carbon benefits when there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest’s current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

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These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests."

Nancy Henderson
Lincoln Massachusetts 01773

Comment #48

"I am opposed to the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. If the details missing from these summaries are in the plans themselves, where are these available to the public? There is no mention of third-party monitoring or impartial audits of past or ongoing activities. Patch cutting has been going on for at least 10 years so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas."

Judith Black
Marblehead Massachusetts 01945

Comment #49

"Good afternoon -

I appreciate the opportunity to share my concerns with you. I am opposed to the 2026 DWSP

logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. If the details missing from these summaries are in the plans themselves, where are these available to the public? There is no mention of third-party monitoring or impartial audits of past or ongoing activities. Patch cutting has been going on for at least 10 years so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas.

On the CFC there was a clear tension between proforestation thinking and conservation forestry adherents. These plans show only the forestry approach, allowing ongoing active management. Referring to logging events as “harvests” is a clear indication of the intent to keep forests producing a crop rather than treating them as a protected ecosystem.”

Paul Toomey

Brookline Massachusetts 02445

Comment #50

"Hello!

Thank you for the opportunity to share my concerns with you.

I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not

forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Liza Connelly

Brookline Massachusetts 02445

Comment #51

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks.

I am opposed to the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. Without consistent observation or metrics from past 10 years, the DWSP has no basis to support continued logging of watershed areas."

Marguerite C. Toll

Barre Massachusetts 01005

Comment #52

"I am opposed to the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

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On the CFC there was a clear tension between proforestation thinking and conservation forestry adherents. These plans show only the forestry approach, allowing ongoing active management. Referring to logging events as "harvests" is a clear indication of the intent to keep forests producing a crop rather than treating them as a protected ecosystem."

Laurie Markoff

Holliston Massachusetts 01746

Comment #53

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

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Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

John Hess
Roslindale Massachusetts 02131

Comment #54

"I oppose the DWSP's logging plans because intact, older forests left as wildlands are critical refuges for countless woodland species—many of which have already been in steady decline for decades.

Research shows that active forest management—logging in particular—has been a major driver of bird population loss. A landmark study in *Nature Ecology & Evolution* (Betts et al., 2022) found that widespread clear-cutting and the shift toward intensified forestry led to "substantial reductions in old forest." Although their analysis focused on Eastern Canada, most of the 54 bird species they studied also nest, winter, or migrate through Massachusetts. The authors warned: "If maintaining non-declining populations of forest birds is the goal, conservation measures that halt the alteration of habitat, particularly in diverse, older forests, will be necessary." This makes it clear: protecting the mature forests of the Quabbin, Ware, and Wachusett watersheds is essential.

The numbers are sobering. Seventy-two percent of the bird species examined showed significant declines, while only three species increased. Among the steepest losses were Blackburnian warblers and Golden-crowned Kinglets—species that rely on mature forest habitat.

Logging does more than fragment forests. The machinery itself is destructive. A 40-ton feller buncher, for example, crushes soil life—microbes, fungi, tree roots, and even vertebrates sheltering underground in winter. In the past, logging was timed for frozen ground to minimize damage. Today, with climate change softening winter soils, compaction, rutting, and runoff are becoming routine consequences.

The evidence is clear. State agencies can no longer afford to dismiss the warnings on climate and biodiversity. The time has long come to prioritize protection of older, diverse forests over short-term logging interests. Thank you."

Wyatt Shell
Northampton Massachusetts 01060

Comment #55

"I oppose the 24 current watershed forestry project proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. Logging is not necessary to provide clean and abundant drinking water. Logging would reduce carbon accumulation and increase carbon emissions.

Therefore I oppose logging at the water supply."

Linda Lewison

Sandwich Massachusetts 02563

Comment #56

"Logging is destructive and unnecessary!

I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

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Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Olivier Resca

Lee Massachusetts 01238

Comment #57

"Hello, my name is Kathryn Bowman. I am a physician, a scientist, and an avid outdoors enthusiast. I am writing now because I am opposed to the 2026 DWSP logging plans because they do not reflect the clear findings of the Climate Forestry Committee (CFC): that the forest functions best when left unmanaged and that older trees don't just sequester more carbon, they also harbor more biodiversity. Instead, some plans call for cutting patches in areas with older growth and mature trees. These are exactly the places that should be left alone. In fact, they should be incorporated into permanent reserves, which are mentioned in the CFC report, but do not currently exist in the watershed. Other areas are part of continuing rotations of cutting that mean the forest can never mature.

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. If the details missing from these summaries are in the plans themselves, where are these available to the public? There is no mention of third-party monitoring or impartial audits of past or ongoing activities. Patch cutting has been going on for at least 10 years so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas.

On the CFC there was a clear tension between proforestation thinking and conservation forestry adherents. These plans show only the forestry approach, allowing ongoing active management. Referring to logging events as "harvests" is a clear indication of the intent to keep forests producing a rather than treating them as a protected ecosystem."

Kathryn Bowman

Charlestown Massachusetts 02129

Comment #58

"oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

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Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Elena Tillman

South Hadley Massachusetts 01075

Comment #59

"I am opposed to the DWSP logging proposals, because older intact forests preserved as wildlands provide habitat for vast numbers of woodland species, including many that have been declining over the decades.

Forest degradation due to active forest management (i.e. logging) was a primary cause of bird species decline, according to an article in Nature Ecology & Evolution (Betts et al., 2022). In the first large landscape scale study of the impact of forest management on bird populations, researchers said, "...we found substantial reductions in old forest as a result of frequent clear-cutting and a broad-scale transformation to intensified forestry." While the 54 birds examined are from Eastern Canada, the majority of them also nest, winter, or migrate through Massachusetts. The authors conclude that "If maintaining non-declining populations of forest birds is the goal, conservation measures that halt the alteration of habitat, particularly in diverse, older forests, will be necessary." We need to protect the diverse older forests in the Quabbin, Ware, and Wachusett watersheds.

Seventy two percent of 54 species that were studied showed significant population declines, and only 3 species showed population increases. Some of the largest population losses were for the Blackburnian warbler and the Golden-crowned Kinglet, species that need mature forests.

To make matters worse, heavy equipment, such as a 40-ton feller buncher, damages soil microorganisms, fungal networks, tree roots, and even vertebrates by crushing them as they hide beneath the soil in the winter. Historically, logging operations were conducted in the winter to take advantage of frozen ground. Now with climate change, the ground is softening and soil compaction and creation of ruts and runoff are routine.

It is time for State agencies to stop ignoring climate and biodiversity warning signs."

Heidi Koelz
Acton Massachusetts 01720

Comment #60

"There are so many negative effects of the logging proposed for forests in Quabbin, Ware, and Wachusett that they far outweigh the positive effects. Particularly concerning to me are the proposal to leave several acre sized clear cuts and the failure to set a limit on the weight of heavy equipment to be used.

I will end with a quote here from a Sierra Club source which attests to the many unanswered question in the proposal as this concerns me greatly, too:

Overall, these plans mention climate and biodiversity enhancement but have no details. What is the baseline ecology observed in these areas—not just trees for lumber and game for hunting, but soil health, microbial life, vernal ponds, insect habitat, for example? DWSP must specify how specific goals will be met, how results will be measured, and how work in one area will affect another. If the details missing from these summaries are in the plans themselves, where are these available to the public? There is no mention of third-party monitoring or impartial audits of past or ongoing activities. Patch cutting has been going on for at least 10 years so how has that affected forest ecology? Without consistent observation or metrics, the DWSP has no basis to support continued logging of watershed areas"

Linda Clark
Easthampton Massachusetts 01027

Comment #61

"I am opposed to all logging in the 2026 DWSP forest plans because logging is never climate-smart despite the many claims to the contrary. The growing consensus of scientists is that we must expand forest protection to multiply forest carbon storage capacity, as we phase out fossil fuels. The 2026 plans do not expand forest protection. They will log in around 1,200 acres of trees, which is roughly the same harvest rate as previous years. Logging decreases carbon storage in trees and in soil, where half of the forest carbon is stored. DWSP continues business as usual—management with logging, but now with a “climate-smart” label.

Every DWSP plan justifies patch cuts and thinning in order to build forest resilience. In fact, mature and old growth forests provide more resilience from natural disturbances. There is a lack of long-term scientific evidence supporting the idea that logging (human-induced disturbance) improves resilience to natural disturbances (hurricanes, drought, insect invasions, wildfire). There is a growing consensus that leaving forests wild, unmanaged, and allowed to grow old is the most effective way to maximize structural complexity, age and species diversity, as well as store more carbon (Faison 2020).

Foster and Orwig (2006) found that ecosystem services were not affected by even extreme natural disturbances, such as the 1938 hurricane, or serious insect infestations. The way to maximize the many benefits forests provide is to set them aside as forever wild."

Kristine Acevedo

Boston Massachusetts 02122

Comment #62

"As a Western Mass native, I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

Despite a blizzard of claims that logging enhances the benefits forests provide, no evidence is provided that any such benefits actually exceed the harm logging always incurs."

Ann Fisher

Somerville Massachusetts 02144

Comment #63

"I oppose all 24 FY26 DWSP cutting projects because of their negative impacts on ecosystems and climate. The 'Climate Change Considerations' section of each proposal is set up as if it is project specific, but instead contains boilerplate descriptions of "climate-smart forestry." It does not address impacts to any individual projects. How can the state claim carbon benefits when

there are no required metrics to calculate the true carbon cost of cutting for each project? The state should require an inventory of the forest's current carbon value, carbon cost of cutting, resulting soil damage, and forgone carbon accumulation while the forest regenerates. Mitigation efforts to restore carbon deficits created by the project should also be required.

Many of the statements are inconsistent with current climate and forest science and are contrary to the Climate Forestry Committee's Recommendations made by the panel's scientists. For example, there is no evidence that logging improves a forest's resilience from major climate events. Evidence DOES support that forests are more resilient to natural events if left intact. "Extending regeneration periods," harvesting to increase "resilience" or to "align with natural disturbances" may reduce the climate impact of logging, but do not come close to the benefits of not logging at all.

These proposals use the language of the CFC while mostly continuing business as usual. "Climate smart forestry" may be good for producing wood products, but it is never a good climate or biodiversity solution. The state must stop pretending it is. Leave public forests intact and protect additional forests from both development AND extraction to maximize the climate mitigating potential of forests.

Governor Healey was elected on a climate platform. She must stick to her promises."

Lara Sullivan

Lincoln Massachusetts 01773

Comment #64

"I strongly oppose this project. Please recognize and honor the urgency of protecting our forests and wildlife, whether for climate change reasons or for the overall wellbeing of the planet and ourselves- physically and psychologically.

Natural preservation is not adequately addressed, respected, or practiced in our environmental protection actions. It is the primary approach we need to pay attention to for our survival and wellbeing.

Thank you."

Tanya Gailus

Concord Massachusetts 01742

Comment #65

As a Boston resident, I have always taken pride in the quality of our public water supply. Of course, this quality is assured by the preservation of the forest lands around the Quabbin and Wachusett reservoirs. The idea of logging any of these lands appalls me! Don't cut those trees!

John Berg
Dorchester Massachusetts 02124

Comment #66

"I am opposed to the DWSP logging proposals, because older intact forests preserved as wildlands provide habitat for vast numbers of woodland species, including many that have been declining over the decades.

Forest degradation due to active forest management (i.e. logging) was a primary cause of bird species decline, according to an article in Nature Ecology & Evolution (Betts et al., 2022). In the first large landscape scale study of the impact of forest management on bird populations, researchers said, "...we found substantial reductions in old forest as a result of frequent clear-cutting and a broad-scale transformation to intensified forestry." While the 54 birds examined are from Eastern Canada, the majority of them also nest, winter, or migrate through Massachusetts. The authors conclude that "If maintaining non-declining populations of forest birds is the goal, conservation measures that halt the alteration of habitat, particularly in diverse, older forests, will be necessary." We need to protect the diverse older forests in the Quabbin, Ware, and Wachusett watersheds.

Seventy two percent of 54 species that were studied showed significant population declines, and only 3 species showed population increases. Some of the largest population losses were for the Blackburnian warbler and the Golden-crowned Kinglet, species that need mature forests.

To make matters worse, heavy equipment, such as a 40-ton feller buncher, damages soil microorganisms, fungal networks, tree roots, and even vertebrates by crushing them as they hide beneath the soil in the winter. Historically, logging operations were conducted in the winter to take advantage of frozen ground. Now with climate change, the ground is softening and soil compaction and creation of ruts and runoff are routine.

It is time for State agencies to stop ignoring climate and biodiversity warning signs."

Diane LeDuc
Harwich Massachusetts 02645

Comment #67

"I oppose all 24 current Watershed Forestry Project Proposals because they reduce the ecological services watershed forests provide while doing nothing to improve water quality. As the DWSP admitted to the Climate Forestry Committee, logging is not necessary to provide clean and abundant drinking water supplies. In fact, the proposed logging reduces carbon accumulation and increases carbon emissions at the expense of ecological integrity, biodiversity protection, and rapid recovery from natural disturbances.

One important concern is that no limits are placed on the size of the logging equipment to be employed. Forest soils are complex, biologically diverse, and critically important components of forest ecosystems, but they are fragile and easily damaged by heavy equipment. The heavier the equipment the greater the risk of serious trauma from compaction and disturbance – trauma that profoundly alters the structural and ecological integrity of soils and damages fungal networks. Heavy equipment also harms the forest by crushing or breaking the roots of any remaining trees. To allow such equipment throughout the forest amounts to forest abuse not forest care.

Another concern is the emphasis on clear cuts, euphemistically called patch cuts, up to several acres in size. All of these involve the destruction of many healthy trees actively accumulating carbon and supporting a myriad of other life forms. It is difficult to avoid the conclusion that harvest is the primary mission and care for the forest and the ecological services it provides, including high quality water, are of only secondary importance. Every proposal must generate monetary profits for loggers even if that entails large ecological losses.

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Hanna Clutterbuck-Cook
Roslindale Massachusetts 02131

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Christine Roane
Springfield Massachusetts 01108

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Jessica Grigg

Boxford Massachusetts 01921

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Somerville Massachusetts 02143

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Vivian Hood

Maynard Massachusetts 01754

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Erin Staudt

Andover Massachusetts 01810

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Susan Sullivan

Northampton Massachusetts 01060

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It is time for State agencies to stop ignoring climate and biodiversity warning signs."

Johnathan Sylvia
South Yarmouth Massachusetts 02664

Comment #75

The trees are needed to keep our water clean

Christina Taylor
7 Wilson St Massachusetts 01760

Comment #76

stop the logging

miriam and Mike Kurland
Williamsburg Massachusetts 01096-9771

Comment #77

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It is past time for State agencies to stop ignoring climate and biodiversity warning signs!"

Tara Wallace

Westfield Massachusetts 01085