

FALL 2012 GENERAL FORESTRY COMMENTS AND RESPONSES

Individual or Organization	Public Comment Summary	BOF Response
Richard Stafursky	Disagrees with the DCR logging Plans for all six projects and the Forest Futures Vision.	The DCR respectfully submits that this topic was debated in dozens of public meetings and written comments resulting in the Woodland, Park and Reserve designations of State Forest Parks and Reservation properties. The six proposed forest management projects are in properties designated as Woodland where the “ forestry practices will be directed at protecting forest productivity through sustainable forestry, providing resilience in watershed forests through active management, managing conditions to promote late forest successional structure and early forest successional stages, and producing high quality, high value, local forest products” (2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines)
Glen Aspeslagh	Terminology in proposals is too technical.	Forestry is a scientific field that uses technical terminology. The Bureau of Forestry recognizes though that the intent of these proposals is to communicate our intentions to the lay public and we will make a better effort to use less technical, more understandable terminology.
	What will be the revenue from each project?	The revenue from the sale of standing timber is unknown at the time of the proposal. Timber markets like other commodities fluctuate continually.
	How are harvesting limitations enforced; what are the penalties for not observing limitations.	Timber is sold under a permit/contract that has strict provisions monitored by a forester. Violation of contractual obligations can result in a significant monetary fine for cutting undesignated timber or damaging a wetland resource. Unfulfilled contract obligations stemming from violations can ultimately result in the forfeiture of the performance bond which is also a significant sum.
Mass Audubon, The Nature Conservancy, Gregory Cox, Jim McSweeney, Michael Barry, Michael R. Banas, Rod Setkewich, Lyle Brundige, Kieth	Supports the resumption of forest management on Woodlands designated within DCR State Forests, Parks and Reservations	The DCR Bureau of Forestry appreciates the comments of support.

<p>A. Argow, Robbo Holleran, Robert J. Saquet, Peter Miles, John R. Clarke, Thomas Anderson</p>		
<p>Thomas Anderson</p>	<p>Economic benefits of active forest management should be emphasized.</p>	<p>Economic benefit to local economies is an important part of forest management in Woodlands that is an outgrowth of wood production. Other ecosystem services in addition to wood production equally important on state lands are water protection and production, diverse habitats, recreation opportunities, and carbon sequestration.</p>
<p>Thomas Anderson, Robbo Holleran</p>	<p>Don't hide logging from the uniformed public; promote benefits of forestry to the public</p>	<p>The Bureau of Forestry will observe roadside buffers to "maintain a forested appearance and an attractive landscape" (MA Forestry Best Management Practices Manual). Per policy, the Bureau will post information signs on site prior to harvesting operations and conduct pre-harvest walks at each site to help the public better understand active forestry operations.</p>
<p>Scott Gerrish, Michael Barry</p>	<p>Supports and encourages local production of forest products benefiting local economies.</p>	<p>To help encourage local forest product production and consumption the DCR Bureau of Forestry is developing a system where prospective timber sale purchasers that are certified under the Department of Agricultural Resources' Commonwealth Quality Seal program will be given a priority incentive in bidding on DCR timber sales.</p>
<p>Robbo Holleran</p>	<p>Controlling diseased beech is important. To reduce the need for herbicide use, create larger openings for increased light so that beech does not flourish.</p>	<p>The DCR Bureau of Forestry recognizes that American beech regeneration can ultimately dominate forest stands and appreciates insight to controlling beech regeneration. We are generally restricted at this time to small opening sizes of 1/3 acre or less without further DCR Commissioner approval.</p>
<p>Robbo Holleran</p>	<p>Use logging operations and machinery to close roads to</p>	<p>It is the intent in our harvesting operations to implement contractual obligations to maintain and close forest roads and also to use revenue generated as a means to mitigate damage to roads due to ORV use.</p>

	illegal off road vehicle (ORV) use.	
Kieth A. Argow	State Forests should exemplify the best in forest management and provide an example to private woodland owners.	This is our intention moving forward. See page 37 of Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines : <i>“The emphasis of forest management in Woodlands will be to provide the range of ecosystem services that sustainably managed forestlands offer, as well as educational examples of excellent forestry to landowners and the general public”</i>
MA Division of Fish and Wildlife (DFW) Note: DFW reviewed pre-public release of the forest management project proposals.	Suggest improvement in articulating goals, values and context of each project.	An introductory section was added to each proposal to articulate goals, values, context and rationale of the respective projects.
DFW	Consider increasing the forest opening sizes beyond the current 1/3 acre.	The DCR Bureau of Forestry will be working with DFW to analyze the DCR landscape to determine appropriate locations to create and enhance young forest habitat where, with DCR Commissioner approval, forest opening size can and should be > 1/3 acre.
DFW	Consider using ecological communities as the basis of silviculture instead of the “stand” in reference to prescribing treatments meant to emulate extensive disturbance on a local scale (flooding and fire).	These 6 projects were specifically designed to demonstrate silvicultural techniques prescribed at the stand level. The DCR Bureau of Forestry agrees that human intervention in the natural disturbance process has changed the vegetation structure of landscapes in Massachusetts and that there are many instances where the ecological community should be the basis of prescribed forest treatment. An excellent example of this is the pitch pine/scrub oak community naturally commonly present on sandy outwash soils in southeast Massachusetts.
DFW	Explain better	The final forest management proposals and silvicultural

	the concept of diversity.	prescriptions have incorporated better language to describe the intent to manage for diversity of species, height, size, age and horizontal structural components in forests; short and long term .
DFW	Encourages pre-harvest inventory or monitoring data to be collected and included in the harvest proposal.	It is the DCR Bureau of Forestry policy and implemented procedure to conduct a stand level inventory prior to preparing a silvicultural prescription which <u>follows</u> the initial forest management/harvest summary proposal; see pages 71 – 75 of the Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines and the Public Outreach Policy . Pre-harvest inventories have been conducted for all 6 project areas.
DFW	Include locus map, ortho-photo map and topographic map with summary proposals that indicates site specific details of the proposed harvest areas.	Each proposal included a locus map and topographic map per policy that included site specific detail. The use of an ortho-photo was considered for the harvest summaries as policy was being prepared but was decided against because of the difficulty in reproducing or printing the image for field or presentation use. We will reconsider using this option. In retrospective review, we note that the site specific detail included on the maps in some proposals was not consistent. The DCR Bureau of Forestry will look to improve the detail included on maps on future proposals.

Fall 2012 - Breezy Knoll Forest Management Proposal - Responses to Comments

Individual or Organization	Public Comment Summary	BOF Response
Ed Klaus	Keep the Leyden State Forest actively managed; recommends turning it in to an uneven forest.	Leyden State Forest is a Woodland designation and will be actively managed. The current forest management proposal suggests an uneven aged management approach.
Thomas Anderson	Recommends thinning/harvesting in wetlands as the regulations allow.	The Bureau of Forestry will take the conservative approach and avoid harvesting in wetlands whenever possible.

**Fall 2012 - Federated Womens Club State Forest Campground Forest Management Proposal -
Responses to Comments**

Individual or Organization	Public Comment Summary	BOF Response
Glen Aspeslagh	Does not agree that timber harvesting within the Quabbin watershed is appropriate.	<p>Properly applied timber harvesting using Best Management Practices is overwhelmingly supported as an appropriate tool to diversify landscape height, size and species components in a watershed forest. Forest diversity maximizes the resistance and resilience of the forest in response to hurricanes, tropical storms, insects, and disease effectively protects the forest from wholesale loss. It is this approach that is used by the Division of Water Supply Protection (DWSP) in the Quabbin Watershed forestry program. See the recently released Science and Technical Advisory Committee report on the DWSP Forestry Program http://www.mass.gov/dcr/watersupply/watershed/stac.htm</p>

Fall 2012 - Eggshell Lot Forest Management Proposal - Responses to Comments

Individual or Organization	Public Comment Summary	BOF Response
Thomas Anderson	Recommends thinning/harvesting in wetlands as the regulations allow.	The Bureau of Forestry will take the conservative approach and avoid harvesting in wetlands whenever possible.
Thomas Anderson, Joseph Larson	Make openings larger than proposed 1/3 acre maximum; apply forest management techniques benefitting wildlife species of greatest concern.	Bureau of Forestry Policy is that forest openings from harvesting that exceed 1/3 acre must receive Commissioner approval. This harvest proposal and the others proposed at this juncture have chosen management approaches that emphasize small openings to create uneven aged and irregular forest structure. The Bureau is working with MA Division of Fish and Wildlife to identify Woodland areas best suited for early seral forest structure created through larger forest openings.
Joseph Larson	Suggest listing bird "Species of Greatest Concern" that may be present here and may be negatively affected by the proposed management approaches in this proposal.	The silvicultural prescription prepared for the Egg Shell Lot has cited publications that list these species.

Fall 2012 - Sherlock Lot Forest Management Proposal - Responses to Comments

Individual or Organization	Public Comment Summary	BOF Response
Thomas Anderson	Recommends thinning/harvesting in wetlands as the regulations allow.	The Bureau of Forestry will take the conservative approach and avoid harvesting in wetlands whenever possible.
Thomas Anderson	Protect snags as much as possible	Bureau of Forestry policy is to retain all standing dead trees to the extent possible where safety is not compromised.

Fall 2012 Freetown Co-peace Forest Management Proposal - Response to Comments

Table 1. Comments relative to the rehabilitation of the eroded slope.

Individual or Organization	Public Comment Summary	Bureau of Forestry (BOF) Response
<p>M. P. Burnham, Brian Pearson / Chairman of the Fall River Bicycle Committee, Jeffrey Heroux, Lori Sweeney, Barry French, Stefani Koorey, Thomas Athearn, Massachusetts Forest and Park Friends Network, Mass Audubon</p>	<p>Eroded slope should be rehabilitated prior to timber harvesting. Specific detailed plans needed for rehabilitation.</p>	<p>The Department of Conservation and Recreation (DCR) acknowledges the severity of the erosion, its damage to the forest, and looks to rehabilitate the slope.</p> <p>The rehabilitation project’s main objectives will be to: 1. stop illegal activity on the slope; and 2. stabilize and rehabilitate the slope. In order to prohibit access, physical barriers will be needed to deter people from accessing the project area and currently eroded slope. Selective felling and interlocking of logs at entry points nearby will establish obstacles for people trying to access the area. In addition, boulders will be brought in to further discourage use. Signs will be posted to bring awareness to this fragile site and that access is being denied in order for it to be rehabilitated. Patrols by DCR rangers, Environmental Police, and park staff will be required to ensure continued exclusion. Joint “sting” operations with the issuance of citations and fines will be considered.</p> <p>The stabilization of the slope will come from placing stumps, root wads, slash, and soil into the formed gullies. If deemed necessary, log terraces will be built to further hold back and stabilize the slope. The large material will anchor the slash and soil and provide a growing surface in which native plants could take root. Native plants in a variety of forms and patterns will be planted. If deemed necessary, the slope could be sprayed with compost to help establish an organic base for native growth. As the existing organic layer is naturally thin on the slope it will take time for the slope to be fully vegetated.</p>

		<p>DCR has taken steps towards the rehabilitation of the slope by applying and having this rehabilitation project selected by the Student Conservation Association of Massachusetts as one of their 2013 conservation projects. DCR will reach out to fellow Southeastern Massachusetts Bioreserve partners to fully implement and complete a rehabilitation project. DCR is also looking into the possibility of using funds from fines of illegal OHV use in this project.</p>
<p>Mass Audubon</p>	<p>This particular site requires special attention, including further evaluation of whether forestry is the best mechanism for addressing existing and ongoing OHV damage.</p>	<p>In-kind services from the forest management proposal can assist in providing materials, supplies, or machinery as part of a rehabilitation project. The local motorcycle user group (e.g. Pilgrim Sands Trail Riders) will be asked to be part of the rehabilitation project. Other illegal trails, trails not shown on the 2012 Freetown/Fall River State Forest Trail Map, within or near the timber harvest operations will be blocked by felling trees along and across the trails.</p>

Table 2. Comments relative to conducting a survey of which species will benefit and which will be harmed by the forest management proposal.

Individual or Organization	Public Comment Summary	BOF Response
<p>Brian Pearson / Chairman of the Fall River Bicycle Committee</p>	<p>Any commercial timber cutting in the Freetown State Forest section of the Southeastern Massachusetts Bioreserve must be put on hold until a complete survey is done of which species will benefit and which will be harmed by commercial logging in this Bioreserve area.</p>	<p>The BOF recognizes that each property on which it has forestry oversight has certain unique natural characteristics. During the Timber Harvesting Proposal and Summary preparation process, management foresters consulted with Regional Directors, State Forest/Park Supervisors, DCR Bureau of Planning and Resource Protection staff, Recreation staff, other pertinent DCR Operations staff, and the MA Division of Fish and Wildlife staff to assess the proposed project and its effect on the Freetown/Fall River State Forest. Management foresters and staff identified any wetland resource areas, rare or endangered species habitats, certified vernal pools, cultural resources, high public sensitivity, possible conflicts with intensively used areas, special and important public, geological or historic places. Any issues of concern are identified in the Forest Management Proposal, along with steps for mitigation. The silvicultural prescription goes into further detail. The list of research and monitoring needs is extensive in the Massachusetts Southeastern Bioreserve Management plan. The research and monitoring tasks identified in the management plan will be carried out by the partners' program and management staff, volunteers, and/or consultants and other experts as funding comes available.</p>

Table 3. Comments relative to Forest management and the Southeastern Massachusetts Bioreserve Management Plan.

Individual or Organization	Public Comment Summary	BOF Response
<p>Jeffrey Heroux, Joseph F. Carvalho, Massachusetts Forest and Park Friends Network, Green Futures, Mass Audubon</p>	<p>The Forest Management Project does not meet the mission of the Southeastern Massachusetts Bioreserve, timber harvesting is not compatible with the SE Mass Bioreserve management plan. Don't understand how the forest management proposal will benefit the SE Mass Bioreserve. Opposed to commercial logging in the SE Mass Bioreserve. It is important that any forestry operations within the Bioreserve carefully follow the Management Plan.</p>	<p>The BOF respectively disagrees that forest management is not in agreement with the Southeastern Massachusetts Bioreserve Management Plan (SMBMP). The BOF believes the Freetown Copeace forest management project objectives are congruent with the natural resources and cultural resources goals of the SMBMP.</p> <p>In section <u>2.7 Primary Values</u> The SMBMP lists primary values to guide the long-term management of the natural resources of the Southeastern Massachusetts Bioreserve. First on the list is</p> <ul style="list-style-type: none"> • A forest mosaic with an age class, density, and species mix that reflect ecosystem processes for the region. <p>The forest management project will broaden forest structural diversity as forests of varied structures and succession stages provide habitat for different plant and animal species, retain snags and tree cavities that provide wildlife values, and enhance wildlife attributes provided by mast producing vegetation. Creating habitat diversity, both horizontal and vertical will allow for greater biodiversity.</p> <p>As pointed out in <u>2.2.3 Landscape Context</u> of the SMBMP "The forest within the Bioreserve generally consists of even-aged trees lacking the stratification that characterizes a fully functioning, mature forest and that is essential for biodiversity." The more diverse an ecosystem, the more stable and resilient it is in the face of disturbance. The SMBMP discusses different approaches to forest management. A hands-off approach and</p>

		<p>a hands-on approach. In section <u>5.1.1.1 Increase The Diversity of Stand Ages in the Forest</u> “The hands off approach has the potential to undermine Bioreserve values such as water supplies and biodiversity. An active management approach, using sustainable forestry management practices, may be more effective preserving Bioreserve values”. One of the BOF management guidelines is to manage using the principles of ecosystem management for the rehabilitation, maintenance, and protection of forest lands.</p> <p>In section <u>5.1.8.4 Forest Management</u> “Sustainable forestry is the management of forests to meet current objectives (ecological or economical) without compromising the ability of future generations to meet their own objectives. Silvicultural activities, which do not degrade soils, hydrology, continuity of habitats or unique communities, can be used to increase structural and temporal diversity of forest stands thus enhancing native biodiversity. Silviculture has historically been one of the most important land management activities in the bioreserve region and the harvest of wood products should continue to be a component of the bioreserve's management where it supports the goals and objectives articulated for the Bioreserve.”</p> <p>In addition, in section <u>1.7.5 Cultural Resource Goals</u> among the items mentioned is “Maintain and support working landscapes (forestry, agriculture) in and around the Bioreserve that are compatible with the Bioreserve’s mission”.</p>
<p>Massachusetts Forest and Park Friends Network</p>	<p>A forest demonstration site in the SE Mass Bioreserve is not the best use for the SE Mass Bioreserve.</p>	<p>In regards to a demonstration site, section <u>8.4 Best Management Practices</u> of the SMBMP discusses that “the Bioreserve partners should include as part of their education and outreach program to educate landowners on best management practices and other</p>

		<p>available land management and land protection tools.” The March 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines, states that “Commercial timber harvesting that demonstrates a range of “excellent forestry” through the application of best management practices will be the applied management standard, and there will be demonstration forest opportunities to educate landowners and the general public.”</p>
Barry French, Thomas Athearn	<p>Southeastern Massachusetts Bioreserve needs a comprehensive plan solely to enhance the mission of the Bioreserve of natural resource management.</p>	<p>A 154 page Southeastern Massachusetts Bioreserve Management Plan is already in existence with a large section devoted to natural resource management.</p>
Massachusetts Forest and Park Friends Network	<p>Timber harvesting to demonstrate a two age silvicultural system is better done on a property where “Woodlands” is the primary designation rather than on property whose primary designation is a Bioreserve.</p>	<p>DCR has adopted a new land use management structure that incorporates a system of designating the 311,000 acres of DCR parks and forests at a statewide scale into three different zones—Reserves, Parklands and Woodlands—so that incompatibilities among the various ecosystem services can be prioritized and managed system-wide as well as prioritized within the individual zones in an effort to maximize outdoor recreational experiences on DCR lands.</p> <p>Freetown/Fall River State Forest is designated Woodland where the emphasis will be to “. . . provide the range of ecosystem services that sustainably managed forestlands offer, as well as educational examples of excellent forestry to landowners and the general public. Forestry practices will be directed at protecting forest productivity through sustainable forestry, providing resilience in watershed forests through active management, managing conditions to promote late forest successional structure and early forest successional stages, and producing high quality, high value, local forest products.</p>

Table 4. Comments relative to identifying the Important Bird Area (IBA) species and how the planned forest treatment will likely affect their habitat.

Individual or Organization	Public Comment Summary	BOF Response
Joseph Larson-Massachusetts Fisheries and Wildlife Board	I suggest that the Proposal be expanded to identify the IBA species, noting the two of greatest concern. Additionally, I suggest that there be added to the text a section discussing how the planned forest treatment will likely affect their habitats (increase, decrease, or no change).	<p>Freetown / Fall River State Forest is an Important Bird Area, as designated by Mass Audubon. An Important Bird Area is a site providing essential habitat to one or more species of breeding, wintering, and/or migrating birds. Using the North American Breeding Bird Atlas Explorer the BOF reviewed bird species listed in the Massachusetts Comprehensive Wildlife Conservation Strategy, which lists species in greatest need of conservation. Confirmed or probable sighting of bird species in greatest need of conservation within the blocks of the state forest were reviewed for their potential increase, decrease, or no change in habitat.</p> <p>The silvicultural prescription goes into extensive detail regarding species and habitat.</p>

Table 5. Comments relative to Off Highway vehicles.

Individual or Organization	Public Comment Summary	BOF Response
<p>Massachusetts Forest and Park Friends Network, Joseph F. Carvalho, Mass Audubon</p>	<p>No provisions for or consideration of monitoring illegal use or of the need for increased enforcement once staging areas and access roads are cut within the forest. Illegal activity in this area must be prohibited. Recommends the detailed plans (silvicultural prescription) include specific plans for restoration and permanent closure of illegal off-highway vehicle trails. We are concerned that new signage and gating may not be adequate to control illegal OHV activity, and urge DCR to initiate vigorous and ongoing enforcement efforts, including “sting” operations and issuance of citations and fines as allowed by Chapter 202 of the Acts of 2010 and its regulations.</p>	<p>In order to prohibit access, the area will have physical barriers to deter people from accessing the area. Selective felling and interlocking of logs at entry points nearby will occur to establish obstacles for people trying to access the area. In addition, boulders will be brought in, if feasible, to further discourage use. Signs will be posted to bring awareness to this fragile site and that access is being denied in order for it to be rehabilitated. Patrols by DCR rangers, Environmental Police, and park staff will be required to ensure continued exclusion. Joint “sting” operations with the issuance of citations and fines will be considered. Illegal trails, trails not shown on the 2012 Freetown/Fall River State Forest Trail Map, within or near the timber harvest operations will be blocked by felling trees along and across the trails.</p>
<p>Mass Audubon</p>	<p>Forestry-related skid trails may be susceptible to access by illegal OHVs, and the silvicultural prescription needs to specifically address how that will be prevented.</p>	<p>Access to the skid trails will be discouraged by working from back to front of the stand and blocking off skid trails in several places as work is completed.</p>

Table 6. Comments relative to the control of invasive species.

Individual or Organization	Public Comment Summary	BOF Response
<p>Mass Audubon, Massachusetts Forest and Park Friends Network</p>	<p>It is important that the detailed silvicultural plans for each site include pre-treatment for any invasives that already exist on the site; provisions for preventing spread of invasives onto the site during forest cutting (e.g. sanitation of equipment entering the site); and follow-up monitoring and control on all sites following the forestry operation. Does not mention nor does it provide measures for the protection of the harvested areas from the increase potential for invasive plants that are more likely to invade disturbed areas.</p>	<p>The March 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines require that all harvesting machinery be thoroughly cleaned (the exterior, undercarriage, and tires/tracks of all equipment) of mud and other debris with a high-pressure washer at a maintenance facility prior to bringing the equipment on site to minimize the introduction of invasive plant seeds and parts. Management Foresters will inspect all equipment prior to unloading at job sites. The BOF will conduct periodic surveys to identify, map, and quantify impacts of non-native invasive species and develop a response plan.</p>

Table 7. Comments relative to why this site was selected.

Individual or Organization	Public Comment Summary	BOF Response
Green Futures, Mass Audubon	It appears that “Co-Peace 1” and “Co-Peace 2” were just picked at random. We request further clarification of the selection of this particular site within the context of the overall property and the stated rationale and objectives on page 1 of the Freetown State Forest cutting proposal.	<p>The decision to choose a silvicultural system and practices to implement is based on analysis and consideration of the forest stand and site conditions. The emphasis of forest management in Woodlands is to provide the range of ecosystem services that sustainably managed forestlands offer, as well as educational examples of excellent forestry to landowners and the general public. Innovative and complex silvicultural treatments will be used in stands where there is high potential to create and enhance vertical structure, multiple age classes, tree species diversity and large tree size classes.</p> <p>This forest management project will broaden forest structural diversity as forests of varied structures and succession stages provide habitat for different plant and animal species, retain snags and tree cavities that provide wildlife values, and enhance wildlife attributes provided by mast producing vegetation. Creating habitat diversity, both horizontal and vertical will allow for greater biodiversity.</p>