

# MASSACHUSETTS FOREST ALLIANCE

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June 3, 2020

William Hill  
Department of Conservation and Recreation  
40 Cold Storage Dr  
Amherst, MA 01004

Dear Mr. Hill:

Thank you for the opportunity to review and comment on DCR's proposed 2020 State Forest Management projects. We appreciate the extension of the comment period due to the COVID-19 pandemic situation.

The Massachusetts Forest Alliance represents forest landowners, foresters, timber harvesters, and forest products companies. We support DCR's forest management efforts in state forests. Here are some comments about the proposed 2020 projects.

First, we're glad to see varying sizes of projects. Our concern in the past has been that DCR forest management projects in state forests were so large that the number of timber harvesters able to take on the work was significantly limited. By offering some smaller projects, more harvesters will bid on the projects, which could potentially lead to lower costs and/or greater revenue for DCR.

Several of these proposed projects – Balance Rock State Park, Huntington State Forest, and Granville State Forest – deal with unwanted beech regeneration. We find this problem is widely misunderstood by the public, who are concerned about removal of native trees that are a valuable food source for wildlife, especially when it involves the use of herbicides. DCR did a good job of explaining the rationale for controlling beech proliferation during online public meetings – if regeneration is not controlled, the end result is a beech monoculture, which isn't as beneficial as a natural mixed-species forest, and if infected with beech bark disease (which can quickly spread through a beech monoculture stand), the mast produced for wildlife is significantly reduced. There is proven silvicultural science that demonstrates that you may be able to avoid herbicide use if you create larger openings – on the order of up to five acres vs. the now-common 1/3 acre patch cuts. We're glad to see DCR following the science here to create these larger openings to limit beech regeneration and reduce the required use of herbicides on the Balance Rock project.

Many of the projects – Florida State Forest, Huntington State Forest, October Mountain State Forest, Granville State Forest, Erving State Forest, and Marlborough-Sudbury State Forest – involve work on tree plantations. Most of these plantations were planted during the Great Depression by the Civilian Conservation Corps, and some involve non-native species or species planted in places that were not ideally suited for them. While well-intentioned, we now know that a natural, native, mixed-species forest is superior for a variety of ecosystem services.

Across the Commonwealth, we're seeing red pine plantations in particular reach the end of their lifespans, creating a public hazard by trails and roads. There are red pine plantations in a number of the proposed projects. The work to release the natural

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native mixed-species undergrowth is beneficial and it's hard to imagine there could be any serious opposition to these efforts based on the facts and science.

Many of the projects in the western part of the state involve removing ash trees, which have been hit hard by the Emerald Ash Borer, an invasive insect. As this pest continues to wreak havoc on ash trees, it makes sense for DCR to take action to remove some of these trees while they still have some economic value. Ash mortality in the next ten years is less of a prediction and more of a fact. Removing these trees now and converting them to long-lived wood products like lumber, furniture, flooring, or even baseball bats can extend the storage of the carbon these ash trees sequestered long beyond their short remaining lives.

The same can be true of hemlocks facing the hemlock woolly adelgid, which can kill a tree in 4-6 years. We're puzzled by opponents of forest management who insist that the adelgid doesn't represent a serious threat to hemlock trees – forest landowners can tell you otherwise from personal experience. Removing some weakened, infected trees (that would die anyway) can aid the remaining healthy hemlocks by giving them more access to sunlight, water, and soil resources.

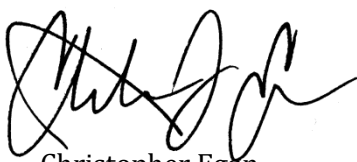
The proposed work in Huntington State Forest to create early successional forest habitat is important. Massachusetts doesn't have enough of this critically important wildlife habitat because we suppress the natural disturbances – especially fire and flooding – that create it. Many species of migratory songbirds, mammals, and other wildlife rely on this habitat and are now threatened or species of special concern in Massachusetts. Building on nearby early successional forest habitat – in this case, on neighboring land that is beginning to age out from the ideal state – is a particularly good idea and helps Massachusetts reach the goals of the Statewide Wildlife Action Plan.

It's important that DCR is a good neighbor and works closely with the communities in which it holds properties – not only sharing revenue from harvests in the Forest Products Trust Fund, but helping resolve issues as partners. We're glad to see signs of this cooperation in these projects, such as responding to the Town of Florida's concerns about hazard trees with the creation of hazard removal strips. We're also glad to see DCR responding to protect water quality in Granville State Forest by re-routing trails and reducing illegal motorized vehicle use.

We think the October Mountain State Forest project to reduce hazardous plantation trees makes a lot of sense as a forest management project instead of contracting with a tree service company to undertake regular removals. This should generate significant cost savings for DCR while resolving the problem at scale.

In summary, we find the proposed projects to be well-described and based on sound silvicultural and other science, and we believe the rationale for conducting this work is clearly apparent and will benefit these forests going forward. Thank you again for the opportunity to comment.

Sincerely,



Christopher Egan  
Executive Director

Massachusetts Forest Alliance

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April 16, 2020 [corrected May 4, 2020]

**Submitted via email to: Jessica Rowcroft [jessica.rowcroft@state.ma.us](mailto:jessica.rowcroft@state.ma.us) and  
Timber.Comments@state.ma.us**

Jessica Rowcroft, Project Manager  
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**RE: Comments on Seven DCR Proposed Forest Management Projects**

Dear Ms. Rowcroft,

We are writing to comment on seven forest management projects that are being proposed by the Massachusetts Department of Conservation and Recreation (DCR) in seven state forests.<sup>1</sup> The projects include Balance Rock Lot (Balance Rock State Park)<sup>2</sup>, Cold River Lot (Florida State Forest)<sup>3</sup>, OMSF Day Use Area (October Mountain State Forest)<sup>4</sup>, Horse Valley Lot (Huntington State Forest)<sup>5</sup>, Erving Red Pine (Erving State Forest)<sup>6</sup>, Hubbard River East Lot (Granville State Forest)<sup>7</sup>, and Goodale-Chipman Lots (Marlborough-Sudbury State Forest).<sup>8</sup>

DCR has issued an individual proposal for each logging project. These proposals include a number of claims regarding the purported benefits of logging, most of them presented in more than one project plan. These comments cite some of the major claims made in the DCR proposals and our response to these claims.

There may be some legitimate need for some of these logging activities, such as the removal of hazard trees. However, we are concerned that in most cases the claimed benefits of these logging projects are either questionable or not supported by the facts.

**Carbon Sequestration**

**DCR claim:** DCR contends that logging will “sequester carbon in retained overstory trees, permanent forest products produced from the harvest, and in the vigorous regenerating forest [with] a more diverse forest structure that is resilient to disturbance” (Balance Rock Lot, Cold River Lot, Goodale-Chipman Lot, Hubbard River East Lot). On its website, DCR expands on these claims:

*Using current science and up-to-date data from our own lands, the Department of Conservation and Recreation’s Bureau of Forestry leads in delivering carbon benefits on state lands for future generations.*

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<sup>1</sup> Department of Conservation and Recreation. 2020. Forest Management Projects Proposed 2020. Commonwealth of Massachusetts <https://www.mass.gov/guides/forest-management-projects#-forest-management-projects-proposed-2020->

<sup>2</sup> <https://www.mass.gov/doc/balance-rock-forest-management-proposal/download>

<sup>3</sup> <https://www.mass.gov/doc/cold-river-lot-forest-management-proposal/download>

<sup>4</sup> <https://www.mass.gov/doc/omsf-day-use-area-forest-management-proposal/download>

<sup>5</sup> <https://www.mass.gov/doc/horse-valley-forest-management-proposal/download>

<sup>6</sup> <https://www.mass.gov/doc/erving-red-pine-hq-forest-management-proposal/download>

<sup>7</sup> <https://www.mass.gov/doc/hubbard-river-east-lot-forest-management-proposal/download>

<sup>8</sup> <https://www.mass.gov/doc/goodale-chipman-lots-forest-management-proposal/download>

Since 1960, the DCR has monitored forest growth and conditions on its land through a continuous forest inventory (CFI)... There has been a continual accrual of total carbon on the DCR's forest land since 1960. Not only has total carbon increased but carbon stocks per acre on the DCR's lands have nearly doubled as well... DCR's practice of utilizing different forest management strategies — active management on some lands, passive management on other lands — not only provides that diverse carbon portfolio discussed above, it also ensures DCR can provide a variety of forest benefits to our Commonwealth and our neighboring states. The CFI data confirm that timber harvesting has a minimal impact on our overall carbon portfolio. **In fact, carbon in trees harvested represents less than one-half of one percent of the total tree carbon stocks.** [Emphasis in original.]

While it is important to have older stands that hold large amounts of carbon, these carbon stocks are at risk from severe weather, diseases, and pests. A diverse forest includes younger stands that grow vigorously and rapidly accrue carbon along with older stands that store large amounts of carbon, creating a balance between short-term benefit and long-term gain.<sup>9</sup>

**Response:** On its website, DCR claims that, “Using current science and up-to-date data from our own lands [the agency] leads in delivering carbon benefits on state lands for future generations.” Yet, these logging project plans provide only a short statement about carbon sequestration with no information on current carbon stocks, the amount of carbon that will be released by the project, the impact of the project on future carbon sequestration and storage, or how the potential benefits of the project outweigh any negative impacts on climate change. This lack of any substantive information seriously undermines the credibility of the agency’s claim of leadership on “carbon benefits” and calls into question its commitment to address this vital issue beyond mere rhetoric.

The 2008 Massachusetts Global Warming Solutions Act (GWSA) called for dramatic reductions in greenhouse gas emissions beginning in 2020. The 2018 report of the UN Intergovernmental Panel on Climate Change (IPCC) warned that we need to dramatically address climate change by 2030, including not only reducing greenhouse gas emissions from energy production, but also absorbing and storing carbon from the atmosphere — with forests playing a critical role.<sup>10</sup> In 2019, Governor Baker reaffirmed a commitment with 24 other governors in the U.S. Climate Alliance to the goal of sequestering more carbon in forests as a way to mitigate climate change.<sup>11</sup> The logging projects considered here are inconsistent with this growing consensus.

DCR repeatedly touts the fact that carbon stocks are increasing on forest lands it administers and implies that its forest “management” (logging) program is contributing to this increase. In fact, the increase is happening *despite* the logging done by DCR, not because of it.

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<sup>9</sup> Department of Conservation and Recreation. 2020. Managing Our Forests ... For Carbon Benefits. Commonwealth of Massachusetts. <https://www.mass.gov/info-details/managing-our-forests-for-carbon-benefits>

<sup>10</sup> Intergovernmental Panel on Climate Change. 2018. Global Warming of 1.5° C: Summary for Policymakers [https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_version\\_stand\\_alone\\_LR.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf)

<sup>11</sup> United States Climate Alliance. 2020. Natural & Working Lands Challenge (Updated: January 14, 2020) <http://www.usclimatealliance.org/nwlchallenge>

Although widespread clearing in the past has significantly reduced carbon storage in Massachusetts forests, they are among the most carbon-dense in the eastern U.S.<sup>12</sup> In addition, because these forests grow fast, decay slowly, and have an average age of only 75 years, they have centuries of growth ahead. If these forests are allowed to grow back and kept intact to reach their ecological potential — termed proforestation — there is enormous potential for additional carbon storage.<sup>13</sup> Indeed, these forests are capable of storing 2.3 to 4.2 times more carbon than they do currently<sup>14</sup>

DCR would have us believe that its logging program has an infinitesimal impact on climate disruption. This is highly misleading, because it ignores the long-established concept of cumulative effects.<sup>15</sup> When the impacts of logging by DCR are added to the thousands of other logging operations in New England, the United States, and around the world, the impact is massive. In just the northern United States, including New England, logging accounts for about 86% of the carbon emitted by forests each year — far greater than releases by development and other land uses.<sup>16</sup> One study concluded that if logging were phased out on America's public lands it could result in as much as a 43% increase over current carbon sequestration levels.<sup>17</sup> This would be a major contribution to climate stabilization efforts.

Likewise, although some carbon may be sequestered in forest products, this is far less than if the forest were left standing. Studies have shown that even considering conversion to wood products, most of the original carbon in a logged forest will be released to the atmosphere within a relatively short time.<sup>18,19</sup>

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<sup>12</sup> Zheng, Daolan, Linda S. Heath, Mark J. Ducey, Brett Butler. 2010. Relationships Between Major Ownerships, Forest Aboveground Biomass Distributions, and Landscape Dynamics in the New England Region of USA. *Environmental Management* (2010) 45:377–386 DOI 10.1007/s00267-009-9408-3 [https://www.ncrs.fs.fed.us/pubs/jrnl/2010/nrs\\_2010\\_zheng\\_001.pdf](https://www.ncrs.fs.fed.us/pubs/jrnl/2010/nrs_2010_zheng_001.pdf)

<sup>13</sup> Moomaw William R., Susan A. Masino, Edward K. Faison. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. *Front. For. Glob. Change*, 11 June 2019 | <https://doi.org/10.3389/ffgc.2019.00027> <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

<sup>14</sup> Keeton, William S., Andrew A. Whitman, Gregory C. McGee, and Christine L. Goodale. 2011. Late-Successional Biomass Development in Northern Hardwood-Conifer Forests of the Northeastern United States. *Forest Science* 57(6) 2011 [https://www.uvm.edu/giee/pubpdfs/Keeton\\_2011\\_Forest\\_Science.pdf](https://www.uvm.edu/giee/pubpdfs/Keeton_2011_Forest_Science.pdf)

<sup>15</sup> NEPA.gov. 2020. Considering Cumulative Effects Under the National Environmental Policy Act. Chapter 2: Scoping for Cumulative Effects. <https://ceq.doe.gov/docs/ceq-publications/ccenepa/sec2.pdf>

<sup>16</sup> Harris, N. L., S. C. Hagen, S. S. Saatchi, T. R. H. Pearson, Christopher W. Woodall, Grant M. Domke, B. H. Braswell, Brian F. Walters, S. Brown, W. Salas, A. Forek, and Y. Yu. 2016. Attribution of Net Carbon Change by Disturbance Type Across Forest Lands of the Conterminous United States. *Carbon Balance and Management*. 11(1): 24. 21 p. <http://dx.doi.org/10.1186/s13021-016-0066-5>

<sup>17</sup> Depro, Brooks M. Brian C. Murray, Ralph J. Alig, Alyssa Shanks. 2008. Public Land, Timber Harvests, and Climate Mitigation: Quantifying Carbon Sequestration Potential on U.S. Public Timberlands. *Forest Ecology and Management* 255 (2008) 1122–1134 <http://naldc.nal.usda.gov/download/21039/PDF>

<sup>18</sup> John Talberth, Dominick DellaSala, and Erik Fernandez. 2015. Clearcutting our Carbon Accounts: How State and Private Forest Practices are Subverting Oregon's Climate Agenda. Center for Sustainable Economy and GEOS Institute. November 2015 <http://sustainable-economy.org/wp-content/uploads/2015/11/Clearcutting-our-Carbon-Accounts-Final-11-16.pdf>

<sup>19</sup> Ann L. Ingerson. 2009. *Wood Products and Carbon Storage: Can Increased Production Help Solve the Climate Crisis?* The Wilderness Society, Washington, DC.

While a young forest recovering from logging will sequester carbon, the amount stored in the forest will be much less than if the existing trees were allowed to grow.<sup>20</sup> Recent studies show that forests increase the rate of carbon sequestration as they age.<sup>21</sup> By cutting many, if not all, mature trees, the proposed logging projects would release massive amounts of carbon and set back the amount of new carbon sequestration for decades. Furthermore, logging can cause a gradual release of carbon from soils, lasting for decades after the logging is complete.<sup>22</sup>

DCR contends that its logging program protects forests — and carbon stocks — from severe weather, diseases, and pests. However, a study by the Harvard Forest found that:

*there [is] sparse evidence that such approaches achieve their goals of increasing resistance and resilience [and] little evidence suggests that natural disturbances yield negative functional consequences. Therefore, current management regimes aiming to increase long-term forest health and water quality are ongoing “experiments” lacking controls. In many situations good evidence from true experiments and “natural experiments” suggests that the best management approach is to do nothing.*<sup>23</sup>

Other studies also indicate that logging for “protection” is the opposite of what we need, and that increasing the representation of stable, older forest conditions at landscape scales will help sustain healthy, resilient forests.<sup>24</sup>

### “Improvement” of Wildlife Habitat

**DCR Claim:** According to DCR, the clearcutting and other intensive logging that would be implemented by these projects would:

- “Increase biological diversity, improve wildlife habitat, and introduce more complexity into existing stands [which will] install gaps within existing stands and enlarge those gaps that already exist” (Balance Rock Lot, Cold River Lot).

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<https://www.sierraforestlegacy.org/Resources/Conservation/FireForestEcology/ThreatsForestHealth/Cli mate/CI-Ingerson-TWS2009.pdf>

<sup>20</sup> Law, Beverly E., Tara W. Hudiburg, Logan T. Berner, Jeffrey J. Kent, Polly C. Buotte, and Mark E. Harmon. 2018. Land Use Strategies to Mitigate Climate Change in Carbon Dense Temperate Forests. PNAS April 3, 2018 115 (14) 3663–3668. <https://doi.org/10.1073/pnas.1720064115>

<sup>21</sup> N. L. Stephenson, A. J. Das, R. Condit, S. E. Russo et al. 2014. Rate of Tree Carbon Accumulation Increases Continuously with Tree Size. Nature: doi:10.1038/nature12914 (2014). <http://www.nature.com/nature/journal/vaop/ncurrent/abs/nature12914.html>

<sup>22</sup> Petrenko, Chelsea L and Andrew J. Friedland. 2015. Mineral Soil Carbon Pool Responses to Forest Clearing in Northeastern Hardwood Forests. GCB Bioenergy (2014), doi: 10.1111/gcbb.12221. <http://onlinelibrary.wiley.com/doi/10.1111/gcbb.12221/abstract>

<sup>23</sup> Foster, David R. and David A. Orwig. 2006. Preemptive and Salvage Harvesting of New England Forests: When Doing Nothing Is a Viable Alternative. Conservation Biology Volume 20, No. 4, 959–970 DOI: 10.1111/j.1523-1739.2006.00495.x [http://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Foster\\_C onservatioBio\\_2006.pdf](http://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Foster_C onservatioBio_2006.pdf)

<sup>24</sup> Thom, Dominik, Marina Golivets, Laura Edling ,Garrett W. Meigs, Jesse D. Gourevitch, Laura J. Sonter, Gillian L. Galford, William S. Keeton. 2019. The Climate Sensitivity of Carbon, Timber, and Species Richness Covaries with Forest Age in Boreal–Temperate North America. Global Change Biology, Volume 25, Issue 7, Pages 2446–2458 <https://doi.org/10.1111/gcb.14656><https://onlinelibrary.wiley.com/doi/10.1111/gcb.14656>

- “Improve wildlife habitat, specifically browse and cover [to] establish gaps...in order to ensure the recruitment of a new age class [replacement of old trees with young trees] and reduce the opportunity for beech to dominate the opening [including through logging and the use of chemical herbicides] (Cold River Lot).
- “Release established regeneration thus increasing species and age diversity [and] opening up the forest canopy [to] allow grasses, forbs and other forms of browse to become more plentiful [thereby] increasing species and age diversity” (Goodale-Chipman Lots).

**Response:** What DCR calls “improving” wildlife habitat and “increasing biological diversity” by cutting down old trees and clearcutting forests to create “browse and cover,” is called “forest fragmentation” by forest ecologists. There is no objective evidence provided to support DCR’s claims that its logging would be beneficial to forest ecosystems. In fact, the BioMap2 report compiled by the Massachusetts Department of Fish and Game and The Nature Conservancy provides strong evidence that the opposite is true. This report states:

*Forest interior habitat is widely recognized as critically important for species sensitive to forest fragmentation and is becoming increasingly scarce in highly populated regions of the country like Massachusetts.... Many bird species that breed in Massachusetts are sensitive to forest fragmentation, including Ovenbirds, Scarlet Tanagers, and many woodland warblers. Negative results of fragmentation include edge effects such as nest predation by species associated with development such as skunks, raccoons, and house cats; and nest parasitism by species such as the Brown-headed Cowbird that lay their eggs in the nests of other bird species and reduce their reproductive success. Forest interior habitats also support a wide range of native plants, animals, and ecological processes sensitive to other edge effects such as noise and light pollution from roads and development, invasive species establishment, and alterations to wind, heat, and other climate variables.<sup>25</sup>*

Virtually every day brings new evidence of just how complex and interconnected forests actually are and how both complexity and connectedness increase with forest age. Logging to supposedly enhance biodiversity should be understood as an experiment in eco-engineering. Moreover, as the Harvard Forest found, this is an experiment lacking controls because there are no large tracts of natural, intact forest in Massachusetts with which to judge whether the effects of a proposed logging project are beneficial or harmful.<sup>26</sup>

In light of this current lack of adequate information, projects that propose to use logging for wildlife should be subject to the same scrutiny as other engineering projects. This should include a comprehensive environmental impact statement based on such evidence as needed to show that the proposed logging actually has an ecologically beneficial effect.

As Aldo Leopold wrote, “To keep every cog and wheel is the first precaution of intelligent tinkering.” But logging for biodiversity is tinkering on a grand scale while keeping track of only

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<sup>25</sup> Natural Heritage Endangered Species Program. 2010. Forest Core BioMap2 Components. Core Habitat: Forest Core Critical Natural Landscape: NA. Massachusetts Division of Fisheries & Wildlife. <http://www.mass.gov/eea/docs/dfg/nhesp/land-protection-and-management/forest-core.pdf>

<sup>26</sup> Foster, David R. and David A. Orwig. 2006. Preemptive and Salvage Harvesting of New England Forests: When Doing Nothing Is a Viable Alternative. Conservation Biology Volume 20, No. 4, 959–970 DOI: 10.1111/j.1523-1739.2006.00495.x [http://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Foster\\_ConservationBio\\_2006.pdf](http://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Foster_ConservationBio_2006.pdf)

a tiny fraction of the living diversity involved. The diversity of life in forests is poorly documented outside of a few charismatic groups, even here in Massachusetts. Consequently, logging interventions supposedly designed to enhance biodiversity are based on very limited data focused on a very small number of target taxa, while ignoring the far greater diversity that would be evident in a broader sample. Just two of many examples of diversity that are ignored in these and other DCR logging projects are bryophytes and lichens.<sup>2728</sup>

Most of Massachusetts is now covered by forests, as it was long before European settlement. Forests are our most important biome by far, and the preservation of large, contiguous areas of mature forest should be the first priority of biodiversity protection in the Commonwealth. Such expansive intact forests sustain native biodiversity by providing essential habitats, not only in growing live trees, but also in old trees, standing snags, downed wood, diverse understories, and fertile soils.<sup>29</sup> These forests are shaped by natural processes, such as hurricanes and tornadoes, ice storms, insect infestations and disease, beaver impoundments, and fires. Such natural disturbances provide structural diversity, including forest interior habitats as well as gaps and tracts of young forest – without the need for human intervention.<sup>3031</sup>

A recent study found that wilderness areas are far more valuable for biodiversity than previously believed, and that if protected, they will cut the risk of species extinctions in half.<sup>32</sup> The 1-million-acre Boundary Waters Canoe Area Wilderness of Minnesota exemplifies the high level of biodiversity in large protected natural areas. This wildland was found to have a greater total density of birds, total number of bird species, and abundance of individual bird species than adjacent logged national forest lands. Moreover, the richness of species that favor young forests, such as the chestnut-sided warbler, was as great in the wilderness as outside it.<sup>33</sup> This

<sup>27</sup> Selva, S. B. 1994. Lichen Diversity and Stand Continuity in the Northern Hardwoods and Spruce-fir Forests of Northern New England and Western New Brunswick. *The Bryologist*, 97: 424-429.  
<https://www.jstor.org/stable/3243911?seq=1>

<sup>28</sup> Boch S, J. Müller, D. Prati, S. Blaser, and M. Fischer. 2013. Up in the Tree – The Overlooked Richness of Bryophytes and Lichens in Tree Crowns. *PLoS ONE* 8(12): e84913.  
<https://doi.org/10.1371/journal.pone.0084913>

<sup>29</sup> D'Amato, Anthony W., David A. Orwig, David R. Foster. 2009. Understory Vegetation in Old-Growth and Second-Growth *Tsuga Canadensis* Forests in Western Massachusetts. *Forest Ecology and Management* 257 (2009) 1043–1052  
[https://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Damato\\_ForestEcology\\_2009.pdf](https://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Damato_ForestEcology_2009.pdf)

<sup>30</sup> Anderson, Mark, Susan Bernstein, Frank Lowenstein, Nancy Smith, Sigrid Pickering. 2004. *The Nature Conservancy and Sweet Water Trust*. Boston, MA.  
<https://www.sweetwatertrust.org/images/DeterminingtheSizeofEasternForestReserves-SweetWaterTrust.pdf>

<sup>31</sup> Askins, Robert A. 2015. *The Critical Importance of Large Expanses of Continuous Forest for Bird Conservation in Connecticut State of the Birds: Protecting and Connecting Large Landscapes*. Connecticut Audubon Society. (pages 24-28) [http://www.ctaudubon.org/wp-content/uploads/2015/12/StateoftheBirds\\_2015\\_Final\\_Correct.pdf](http://www.ctaudubon.org/wp-content/uploads/2015/12/StateoftheBirds_2015_Final_Correct.pdf)

<sup>32</sup> Di Marco, Moreno, Simon Ferrier, Tom D. Harwood, Andrew J. Hoskins, and James E. M. Watson. 2019. Wilderness Areas Halve the Extinction Risk of Terrestrial Biodiversity Loss. *Nature* Volume 573 Pages 582–585. <https://doi.org/10.1038/s41586-019-1567-7>

<sup>33</sup> Zlonis, Edmund J. and Gerald J. Niemi. 2014. Avian Communities of Managed and Wilderness Hemiboreal Forests. *Forest Ecology and Management* 328:26–34 · September 2014 DOI: 10.1016/j.foreco.2014.05.017  
[https://www.researchgate.net/publication/263202573\\_Avian\\_communities\\_of\\_managed\\_and\\_wilderness\\_hemiboreal\\_forests](https://www.researchgate.net/publication/263202573_Avian_communities_of_managed_and_wilderness_hemiboreal_forests)



is also true of eastern national parks, which tend to have larger trees, older forests, and more deadwood standing and on the ground than surrounding managed forests<sup>34</sup>, as well as greater species richness and a higher percentage of rare species.<sup>35</sup>

There is a broad scientific consensus that we need to expand protected areas to encompass from 30%<sup>36</sup> to 50%<sup>37</sup> of the Earth, if we are to avoid massive global plant and animal extinctions. The Harvard Forest's Wildlands and Woodlands program has called for a modest 7% of New England to be "formally protected" as "true wildlands, in which all active management is precluded and nature prevails."<sup>38</sup> Yet only a little more than 1% of the Massachusetts land base is designated legally as nature preserves that provide for proforestation.<sup>39</sup> This increases to 3% of the state if one includes state-owned reserves that are off-limits to commercial logging — but these have only administrative, not statutory protection.<sup>40</sup>

The fragmentation of natural forest ecosystems not only releases carbon and diminishes biodiversity, but it can also threaten human health. Forest exploitation can drive animals, including zoonotic vectors, into nearby human-occupied areas. For example, it is hypothesized that SARS-CoV-2, the virus responsible for the current Covid-19 pandemic, jumped species from bats to humans.<sup>41</sup>

The same is true almost anywhere on earth. One example in New England regards bat species that normally roost in tree cavities, but will relocate to manmade structures when their forest roosts are destroyed — with a resultant increased probability for human rabies of bat origin.

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<sup>34</sup> Miller, Kathryn M., Fred W. Dieffenbach, J. Patrick Campbell, Wendy B. Cass, James A. Comiskey, Elizabeth R. Matthews, Brian J. McGill, Brian R. Mitchell, Stephanie J. Perles, Suzanne Sanders, John Paul Schmit, Stephen Smith, Aaron S. Weed. 2016. National Parks in the Eastern United States Harbor Important Older Forest Structure Compared with Matrix Forests. *Ecosphere* 7:e01404. doi: 10.1002/ecs2.1404 <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/ecs2.1404>

<sup>35</sup> Miller, Kathryn M., Brian J. McGill, Brian R. Mitchell, Jim Comiskey, Fred W. Dieffenbach, Elizabeth R. Matthews, Stephanie J. Perles, John Paul Schmit, Aaron S. Weed. 2018. Eastern National Parks Protect Greater Tree Species Diversity Than Unprotected Matrix Forests. *Forest Ecol. Manag.* 414, 74–84. doi: 10.1016/j.foreco.2018.02.018 <https://irma.nps.gov/DataStore/DownloadFile/598344>

<sup>36</sup> UN Convention on Biological Diversity. 2020. Zero Draft of the Post-2020 Global Biodiversity Framework. CBD/WG2020/2/3 <https://www.cbd.int/doc/c/efb0/1f84/a892b98d2982a829962b6371/wg2020-02-03-en.pdf>

<sup>37</sup> Dinerstein, Eric et al. 2017. An Ecoregion-Based Approach to Protecting Half the Terrestrial Realm. *BioScience*, Volume 67, Issue 6, June 2017, Pages 534–545, <https://doi.org/10.1093/biosci/bix014>

<sup>38</sup> Foster, David R et al. 2017. Wildlands and Woodlands, Farmlands and Communities: Broadening the Vision for New England. Harvard Forest. Petersham, MA. [https://www.wildlandsandwoodlands.org/sites/default/files/Wildlands and Woodlands 2017 Report.pdf](https://www.wildlandsandwoodlands.org/sites/default/files/Wildlands%20and%20Woodlands%202017%20Report.pdf)

<sup>39</sup> Moomaw, William R., Susan A. Masino, Edward K. Faison. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. *Front. For. Glob. Change*, 11 June 2019 | <https://doi.org/10.3389/ffgc.2019.00027> <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

<sup>40</sup> Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines <http://www.mass.gov/eea/docs/dcr/ld/management-guidelines.pdf>

<sup>41</sup> Zhang, Yang, Chengxin Zhang & Wei Zheng. 2020 11 April. More Evidence Suggests Pangolins May Have Passed Coronavirus From Bats to Humans The Conversation. <https://www.sciencealert.com/more-evidence-suggests-pangolins-may-have-passed-coronavirus-from-bats-to-humans>

Research also shows that in the eastern U.S., the risk of contracting Lyme disease is higher in fragmented forests.<sup>42</sup> Other examples could be cited, but the main point to be made is that undisturbed ecosystems are less likely to disrupt normal zoonosis cycles within wild animal populations that could result in etiologic agents jumping species to the human population.

The Commonwealth of Massachusetts needs far more large tracts of forest that are off-limits to commercial logging, artificial wildlife “management,” and other intrusive activities. This would be possible by providing stronger protection of existing state-owned lands and acquiring additional public holdings. An expanded reserve system would be the envy of the world, not only safeguarding native biodiversity, but also providing many other benefits to people.

### **“Treatment” for Insects and Disease**

**DCR Claim:** The logging proposals claim that cutting down trees and other intrusive management is needed to “treat” fungus, insect infestations, and disease. This includes the “salvage” (logging) of white ash trees before their supposed imminent mortality from the emerald ash borer (Balance Rock Lot, Hubbard River East Lot), the “treatment” (logging) of hemlock trees “infested” with hemlock wooly adelgid (Horse Valley Lot, Hubbard River East Lot) and hemlock looper; and the “removal” (by logging) of beech trees “infected” by beech bark disease (Cold River Lot, Hubbard River East Lot). It also includes the use of herbicide to control “excessive beech proliferation” (Balance Rock Lot, Cold River Lot, Horse Valley Lot, Hubbard River East Lot). In addition, it includes logging to “increase the distribution and density of sugar maple” to “combat” regional sugar maple decline (Balance Rock Lot, Cold River Lot).

**Response:** Insects and disease are a natural part of healthy forest ecosystems. They help decompose and recycle nutrients, build soils, maintain genetic diversity within tree species, and provide homes and food for wildlife. Moreover, there is little evidence to support the assumption by foresters that logging will reduce insects and disease.<sup>43</sup>

Emerging studies find that cutting down trees to “save” the forest from insects and disease actually makes the “problem” worse. For example, a biological analysis done by Acadia National Park, where logging is prohibited, found that logging elsewhere does not appear to have prevented the spread of the red pine scale. Moreover, it was found that moving trimmed or harvested materials in spring through fall had the potential to actually spread the insect.<sup>44</sup>

There is also increasing evidence that logging reduces the natural resistance of a forest to insects and disease. In one study, researchers found that after “thinning” of forest plots, 50% of the genetic diversity of the trees of that species had been lost. Of particular concern was the loss of rare alleles, which plants and animals rely upon to deal with new challenges.<sup>45</sup> An

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<sup>42</sup> Cary Institute of Ecosystem Studies. 2018, 9 July. Forest Ecology Shapes Lyme Disease Risk in the Eastern US. Science Daily. <https://www.sciencedaily.com/releases/2018/07/180709132727.htm>

<sup>43</sup> Black, Scott Hoffman. 2005. Logging to Control Insects: The Science and Myths Behind Managing Forest Insect “Pests.” A Synthesis of Independently Reviewed Research. The Xerces Society for Invertebrate Conservation, Portland, OR [https://www.xerces.org/wp-content/uploads/2008/10/logging\\_to\\_control\\_insects1.pdf](https://www.xerces.org/wp-content/uploads/2008/10/logging_to_control_insects1.pdf)

<sup>44</sup> Acadia National Park. 2014. Invasive Insect Contributing to Red Pine Die-off on Mount Desert Island. National Park Service <https://www.nps.gov/acad/learn/news/invasive-insect-contributing-to-red-pine-die-off-on-mount-desert-island.htm> )

<sup>45</sup> Six, Diana L., Eric Biber, and Elisabeth Long. 2014. Review Management for Mountain Pine Beetle Outbreak Suppression: Does Relevant Science Support Current Policy? *Forests* 2014, 5, 103-133;

annual inventory by the U.S. Forest Service found that, despite an outbreak of the emerald ash borer that killed most ash trees, some trees persisted, and offered options for breeding or reforestation.<sup>46</sup> Cutting down ash trees that have not been infected would cause the loss of trees that could potentially have resistant genes that could be critical in restoring the forest.

DCR seeks “control” of “beech proliferation” because it is deemed “excessive.” This would largely be done through five-acre “openings” (small clearcuts) and herbicide “treatment.” The most commonly used herbicide, Roundup (glyphosate), has been implicated in harmful effects that range from causing cancer in animals to killing honeybees.<sup>47</sup> Concerns have been raised about other herbicides. DCR does not provide any information in these plans on which herbicide would be used and what the potential impacts would be on the health of animals and humans.

DCR has acknowledged that, “natural stands dominated by sugar maple are not common in Massachusetts.” Yet, one of its goals of several of the logging projects is to artificially create such sugar maple-dominated stands. This will be done by cutting down naturally occurring native tree species, such as American beech, yellow birch, black birch, white birch, red maple), and white ash.

There are a number of serious problems with this strategy. Sugar maple decline is a generalized set of symptoms of trees suffering a wide range of different stressors and DCR provides no scientific evidence to show how this logging operation will address the issue.<sup>48</sup> The logging project would also release significant amounts of carbon and set back carbon sequestration for decades in the future. Furthermore, these tracts provide valuable interior forest habitat that would be fragmented by the creation of artificial openings.

### Liquidation of Plantations

**DCR Claim:** Red pine and Norway spruce plantations need to be removed because they are “declining due to fungus, insects, disease, wind damage, or overcrowding, or are susceptible to these factors” (Cold River Lot, Erving Red Pine- HQ, OMSF Day Use Area). This will also allow the “release” of native species in the understory and promote the “restoration” of native forest ecosystems.

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[https://www.researchgate.net/publication/259714120\\_Management\\_for\\_Mountain\\_Pine\\_Beetle\\_Outbreak\\_Suppression\\_Does\\_Relevant\\_Science\\_Support\\_Current\\_Policy](https://www.researchgate.net/publication/259714120_Management_for_Mountain_Pine_Beetle_Outbreak_Suppression_Does_Relevant_Science_Support_Current_Policy)

<sup>46</sup> Koch, Jennifer L., Mary E. Mason, David W. Carey, Kathleen Knight, Therese Poland, and Daniel A. Herms. 2010. Survey for Tolerance to Emerald Ash Borer within North American Ash Species in Proceedings of the Symposium on Ash in North America. U.S. Forest Service Forest Service, Northern Research Station. General Technical Report NRS-P-72 [https://www.fs.fed.us/nrs/pubs/gtr/gtr\\_nrs-p-72r.pdf](https://www.fs.fed.us/nrs/pubs/gtr/gtr_nrs-p-72r.pdf)

<sup>47</sup> Balter, Michael. 2019 7 May. Bee Alert: Is a Controversial Herbicide Harming Honeybees? Yale Environment 360. <https://e360.yale.edu/features/bee-alert-is-a-controversial-herbicide-harming-honeybees>

<sup>48</sup> Houston, David R. 1999. History of Sugar Maple Decline in: Horsley, Stephen B.; Long, Robert P., eds. Sugar maple ecology and health: proceedings of an international symposium; 1998 June 2-4; Warren, PA. Gen. Tech. Rep. NE-261. Radnor, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station: 19-26. <https://www.fs.usda.gov/treearch/pubs/13134>

**Response:** The plantations targeted for logging tend to be 80 years old or more. In many cases the plantations have been thinned by previous logging or through natural mortality. There is already an understory of native trees and herbaceous plants, which are gradually replacing the plantation trees as they die over time. Liquidation of plantations may speed up this process, but there is no evidence that it is necessary to ensure the eventual recovery of the native forest.

The goal of DCR is clearly to maximize commercial timber value by cutting down plantations to “salvage” the trees before they die. However, this comes at a major cost to the forest. Logging would cause major disturbance of forest ecosystems due to fragmentation of interior forest, scarification of soils, and degradation of water and air quality. Logging also can also increase susceptibility to invasive species, spread harmful insects and disease, and worsen the risk of fire. Dead trees also provide important habitat for numerous birds and other species.<sup>49</sup>

Perhaps the greatest cost is that liquidating plantations will worsen climate change. As noted above, this will release most of the carbon in the trees, and a significant amount soil carbon, into the atmosphere within a relatively short period of time. On the other hand, studies indicate that if these trees were left alone, even after they die they would continue to store most of their carbon for decades, releasing it slowly and gradually.<sup>50</sup> This is especially important because as the IPCC warns, minimizing carbon emissions over the next decade is critical if we are to avoid catastrophic climate change.

There are some cases where there is a reasonable need to remove trees that are a hazard to public health or safety. This largely appears to be the case with the OMSF Day Use Area project. DCR should be commended for treating the entire project areas as “parkland,” including some acreage classified as “woodlands.” We do not object to the appropriate use of tree removal where it is shown to be necessary for public health and safety purposes.

### **“Improvement” of Recreational Experiences**

**DCR claim:** Logging will “improve recreational experiences primarily associated with hunting and wildlife viewing,” presumably because it will increase “browse and cover” (Cold River Lot).

**Response:** The logging that is proposed would fragment the forest and create artificial openings. The resulting “browse and cover” (i.e., brush interspersed with forest) would benefit game species that favor these habitats, such as white-tailed deer, ruffed grouse, American woodcock, turkey, and ring-necked pheasant. However, these are all common species, which are in no need of additional habitat.

DCR provides no evidence that additional opportunities for hunting are needed. In fact, hunting demand has decreased across America. Only about 2% of New Englanders are hunters — a number that has dropped by 50% over the last 5 decades.<sup>51</sup>

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<sup>49</sup> Wuerthner, George. 2018. In Praise of Dead Trees. CounterPunch. <https://www.counterpunch.org/2018/12/24/in-praise-of-dead-trees/>

<sup>50</sup> Moore, David J. P., Nicole A. Trahan, Phil Wilkes, et al. 2013. Persistent Reduced Ecosystem Respiration After Insect Disturbance in High Elevation Forests. *Ecology Letters*, (2013) 16: 731–737 doi: 10.1111/ele.12097 <http://onlinelibrary.wiley.com/doi/10.1111/ele.12097/abstract>

<sup>51</sup> U.S. Department of the Interior, U.S. Fish and Wildlife Service, U.S. Department of Commerce, U.S. Census Bureau. 2018. 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. <https://www.census.gov/content/dam/Census/library/publications/2018/demo/fhw16-nat.pdf>

There is no evidence presented that shows there is unmet demand for viewing early-successional species that are not hunted. On the contrary, the state suffers from an excessive deer population, which is overbrowsing vegetation, helping to spread Lyme disease, and causing deer-car collisions<sup>52</sup> It is well documented that fragmented forests support higher deer populations than large tracts of interior forest.<sup>53</sup> Instead of minimizing forest fragmentation, DCR is making this problem worse by increasing habitat for deer through its logging program – and calling it a recreational “improvement.” The public could gain far greater benefits from the opportunity for “viewing” more intact forests, which are increasingly rare.

### **“Sustainable” Wood Products**

**DCR claim:** Logging will provide for “sustainable production” of “locally grown products for the locally grown forest products to the local economy.” (Balance Rock Lot, Cold River Lot, Goodale-Chipman Lots).

**Response:** There is no agreed-upon scientific definition of “sustainable” forestry. DCR’s own management guidelines state that, “Sustainable forest management [is an] evolving concept [which] has several definitions.”<sup>54</sup> The contribution of this logging to the “local forest products industry” is highly dubious, since the agency acknowledges that more than 80% of logs cut on state lands are shipped out of state for processing. Moreover, timber values are so low that local towns receive only a few thousand dollars, at most, as their share of revenue from these sales.

Logging on DCR-administered lands is not essential for the health of local economies. The forest products industry is a very small component of the Massachusetts economy, even in towns with large state land holding. Furthermore, 80% of the state’s forest base is privately owned, offering ample opportunity for logging and wood production where there is demand.

### **Conclusion**

We believe that the people of Massachusetts want our publicly owned forests to be left uncut and intact, as is the goal for areas now designated as reserves. We believe they want opportunities for sanctuary and a sense of wildness, where nature is the manager, not us. We believe this is a basic human need. We would welcome a decision by DCR to refrain from implementing any actions proposed in these management plans that would diminish these values.

Thank you for the opportunity to comment on these seven forest management projects. We look forward to your timely response. You can reach Michael Kellett of RESTORE: The North Woods with questions or a response at [kellett@restore.org](mailto:kellett@restore.org) or 978-392-0404.

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<sup>52</sup> Massachusetts Department of Conservation and Recreation. 2020. Deer Management. <https://www.mass.gov/service-details/deer-management>

<sup>53</sup> Alverson, William S., Donald M. Waller, Stephen L. Solheim. 1988. Forests Too Deer: Edge Effects in Northern Wisconsin. Conservation Biology Vol. 2, No. 4 (Dec., 1988), pp. 348-358. <http://www.jstor.org/stable/2386294>

<sup>54</sup> Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines, p. 59 <https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf>

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June 3, 2020

RE: Proposed DCR timber harvests

Hello: I would like to offer the following comments about the 7 timber harvests that DCR has proposed.

Balance Rock Harvest -- Lanesborough: I support DCR's plan for this proposed harvest to remove mature ash that is being attacked by EABs and create larger openings to increase opportunities for hardwood regeneration in areas with extensive beech sprouts.

Ash is a wonderfully useful species and it is far better to harvest it and use it for different long-lived products than just let it be killed by this invasive pest and have its carbon released for no benefit. My family has had two harvests on its woodlands in the past 5 years to salvage ash and plan one or two more in the next few years. Removing the larger ash while retaining smaller trees will allow us to utilize this very versatile species while buying time for biological controls for EAB to hopefully become practical so ash can again soar on wetter sites in our forests.

We also have extensive experience with the problems of controlling beech sprouts and trying to prevent them from crowding out other hardwood species and making our woodlands less diverse and less resilient. The ice-damaged hardwood stand we had to regenerate in 2015 had an extensive beech understory and even with cutting every stem other than the seed trees to try to control beech, we ended up having to use herbicides at considerable cost to try to limit the beech sprouting. We previously had put in two 2 acre clearcuts for habitat in the late 1990s with excellent results and limited beech, so some sites will respond well to just heavy cutting but others may require spraying as well. Using herbicides in 2016 as a followup did reduce the amount of beech to about 40 percent of all stems, which seems to be low enough to allow adequate regeneration of other hardwoods like red & sugar maple, ash, yellow, black & white birch, and black cherry.

DCR's proposed timing of this harvest to allow another project to be completed to allow recreational uses of roads and trails seems entirely appropriate. I'm sure the town of Lanesborough will be happy to get some of the proceeds from the harvest through the Forest Products Trust Fund.

Cold River Harvest – Florida: This harvest would create openings in non native Norway spruce plantations to gradually convert them to native species and thin a mixed

hardwood stand to provide more growing room for better quality trees. Both of those activities would be beneficial, particularly salvaging declining spruce to allow its carbon to be used productively rather than just be released as the trees die and fall.

One caution I would give is that openings in stands with a substantial beech component need to be large enough to allow regeneration of desired hardwoods, rather than just beech. Larger openings will also provide some early successional habitat for species like woodcock, white throated sparrows, chestnut sided sparrows, rabbits and towhees, which are increasingly uncommon in these heavily forested hillsides.

This harvest will benefit local residents in multiple ways: by creating more young forest habitat for wildlife, by reducing the town's maintenance expenses of the adjacent roads, and by proceeds from the Forest Products Trust Fund which are paid to the town.

Horse Valley Lot – Huntington: This harvest also seems to provide multiple benefits. It would create some young forest habitat for wildlife, it would help healthy large hemlock trees ward off attacks from woolly adelgids and looper by removing competing infested trees, it would restore some of the recreational access by repairing eroded roads in the forest, and, of course, it would generate income which would be shared with the town via the Forest Products Trust Fund.

Improving the health of some hemlock by removing competing declining trees will also help with carbon storage, both in the forest and in the lumber removed which is used in construction. UMass has recently released research showing that hemlock, which is an underused resource, is suitable for use in cross laminated timber construction, a new technology that can substantially reduce the carbon that must be expended to build larger buildings. Hemlock is an important species in our forests to keep streams cool so retaining large healthy hemlock while removing declining ones benefits both the forest and our carbon economy.

October Mountain Day Use Harvest – Washington: This harvest in a parkland provides substantial financial benefit even should it not generate a lot of revenues. By using a harvest to remove trees that affect the safety and operations of the day use area, it will significantly reduce the costs the park incurs to remove hazard trees from the declining Norway spruce and red pine stands that are suffering heavy mortality and blowdowns.

Removing those non native species and replacing them with native species, both by planting and natural regeneration, will have both habitat and recreational benefits. It also will reduce town costs for maintenance along the access road, and like other harvests on DCR lands, provide some revenues to the town thru the Forest Products Trust Fund.

Hubbard River East Harvest – Granville: This harvest would combine elements of both the Balance Rock Park harvest and the Horse Valley lot harvest by removing declining

and threatened ash and hemlock and regenerating both hardwoods and softwoods. Cutting these trees before they die will allow their carbon to be utilized long term and not lost to mortality from imported pests.

The harvest would also help the town and adjacent Farmington River watershed by repairing and relocating eroded roads whose runoff ultimately goes into Hartford's reservoir. Besides saving the town money from reduced road maintenance costs, a share of the timber revenues would be paid to the town via the Forest Products Trust Fund.

Erving SF Headquarters harvest – Erving and Marlboro SF harvest – Marlborough:

Each of these proposed harvests would remove declining red pine stands that are being killed by red pine scale and in Marlborough, release new regeneration to grow with less competition. Salvaging the pine may provide an opportunity for its embedded carbon to be tied up long term in lumber while doing nothing means the carbon will just be released with no benefit to society.

Thank you for the opportunity to comment.

**From:** Gia Neswald  
**Sent:** Wednesday, June 3, 2020 11:56 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on Seven Proposed Timber cutting projects

**Comments on Seven Management Forestry Projects:**

Balance Rock Lot (Balance Rock State Park)  
Cold River Lot (Florida State Forest)  
OMSF Day Use Area (October Mountain State Forest)  
Horse Valley Lot (Huntington State Forest)  
Erving Red Pine (Erving State Forest)  
Hubbard River East Lot (Granville State Forest)  
Goodale-Chipman Lots (Marlborough-Sudbury State Forest)

Process:

It is impossible to produce more specific public comments because the DCR process is flawed. It is only AFTER the public comment period that data collection occurs on site, then a prescription is drafted, and then specific trees are marked, which could be reviewed by the public, if the comments were to take place at this point. We are being deprived of due process because of the DCR procedures described above

For all of the proposed timber sales listed above, the process of providing information to the public was very poor and badly deficient. On June 1, the virtual meeting to cover 5 projects did not begin to discuss the specific projects until 23 minutes into a one and a half hour meeting that should have been allocated at least twice as much time because of the number of projects being presented. Fourteen minutes into the specific presentations, the host apparently inadvertently stopped the video. More time was lost as a result. There were other technical problems which resulted in what Mr. Hill described as a shortage of time. On June 3, there was a similarly overlong preamble, followed by an overly historical presentation by Forester DiNardo, which disallowed the time necessary to complete his presentation and address all questions on the matter at hand. Later in the program, there were nearly ten minutes of delays due to Forester Mike Waterman's failing technology (his audio kept going out). These disruptions and delays resulted in abbreviated presentations, as admitted by each of the aforementioned foresters. Furthermore, many questions posed in the chat went unanswered. It should not be the responsibility of the public to ask those questions more than once, until they are answered, but this is exactly what Mr. Hill suggested. Rather, it is Mr. Hill's or his staff's job to capture and respond to questions by the public who took the time to attend -- and this *before* the comment period is ended, so that public comments can address the answers given by DCR personnel. Furthermore, during these virtual meetings, many questions were faultily paraphrased by the moderator, rather than read verbatim to the DCR personnel to whom the questions were addressed. In the June 1st public meeting, Mr. Hill explained this practice to be "in the interest of time."

In addition, Mr. Hill refused to answer questions regarding the carbon impacts of the specific projects. While he claims that the DCR has a "carbon strategy" based on "a landscape basis," he failed (though asked) to extrapolate that strategy and the CFI data that he acknowledged has been compiled in order to answer multiple questions posed by the public about the carbon impacts of the seven proposed projects. Mr. Hill only responded to say that these forest carbon

inventories were available to the public upon request, which contradicts previous failures by the DCR to produce these records after they were requested both verbally and formally several times since 2016.

I posed a question by typing it into the Zoom Meetings chat about this inventory toward the end of the June 3rd public meeting; it was never presented by the moderator; I received only an apology and request that I re-submit it in my public comments. Therefore, I will reiterate my question a third time now, verbatim:

“Why has the DCR, Keith DiNardo specifically, not provided this CFI [carbon forest inventory] data we already requested?”

To refresh Mr. DiNardo’s memory, my personal first request was made during a roadside conversation that went on for nearly an hour, in which Mr. DiNardo volunteered the existence of the data. This conversation took place at the end of the first day of logging (August 5, 2019) in Wendell State Forest. Public records requests were subsequently submitted. I continue to await a response.

An approach of Proforestation should be considered in the case of all seven of the proposals. On June 1st at 4:35 p.m., Mr. Hill told us, “I don’t know a lot about Proforestation.” This is a favorable management approach that is critical to our survival of the Climate Emergency. I suggest that all of these projects should be put on hold until the head of our Management Forestry Division familiarizes himself with this essential concept.

In the context of the statute which Mr. Hill did not recognize, M.G.L. 132, 2b, the “quiet enjoyment of the facilities by the people” is paramount on our public lands. None of these projects should go forward unless and until the DCR can show how these “commercial activities” are “essential” for that “quiet enjoyment.”

#### Balance Rock Lot (Balance Rock State Park)

- Taking all of the white ash greater than 12” DBH is neither essential for forest health nor favorable for it.
  - There has been no documentation presented to the public that Emerald Ash Borer (EAB) is rampant; there is a history of exaggeration on the part of state foresters who are motivated to sell a timber contract. For example, on
  - Even if EAB is widespread, taking a passive management approach is likely to result in the survival of resistant specimens, a highly important process to allow and one which has been thus far shown to be more efficient by natural forest resistance than in a laboratory.

If the goal is age diversity “including old growth,” as DCR claims, then what are the specifics that guarantee a long-term strategy for “old growth?”

Up to 5 acre openings in 70% diseased beech stands is more like killing the patient to stop the cancer than committing to a goal of wellbeing. These trees are part of a network that requires that connections not be severed. The consequences of this surgical removal of members of the family will be detrimental to the natural development of disease resistance.

- Subsequent to these openings is the “necessary” of herbicides to reduce invasive spread. Glyphosate is causing worldwide threats to our pollinator populations, not to mention to the human beings who are charged with its

application. I strongly object to its use anywhere, and most certainly on our public lands.

Proposed 1/3 acre openings in the oak-hardwood forest are what is termed “high-grading” for commercial profit. It was stated that a goal is “maintenance of resilient forest.” There is copious evidence that our forests naturally propagate for diversity and resilience.

As noted in the group letter submitted by Michael Kellet, the DCR refers to “sustainable” forestry without producing a definition and explanation thereof. This is because, under our state of climate emergency, this practice cannot be defined.

It was stated that a goal was to “retain” hemlock by destroying those likely affected by wooly adelgid. While Kris Massini claimed that this pest “devastated hemlock in Connecticut,” this is another example of DCR forester exaggeration for the sake of ulterior motives. This pest is not devastating to even individual trees, let alone to stands. The same goes for looper; this is well documented in the biology community. Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

#### Cold River Lot (Florida State Forest)

- I asked at the meeting for the forester to explain his statement that this project would provide a number of benefits, including improving wildlife habitat, sequestration and water. The first two of these were addressed to my satisfaction by the group letter submitted by Michael Kellett, so I hereby state my support of these views which refute Mr. Massini’s unsubstantiated claims of benefits. He had no way to explain the benefits to water because, as even the state acknowledged at the DCR Annual Friends meeting in 2019, forests deliver the benefits of cleaning water and greatly reducing flooding.
- Mr. Massini’s claim that long life forest products would continue to store the carbon that would be removed is also an exaggeration. I concur with the answer to this claim in the group letter submitted by Mr. Kellett.
- If, as stated, this is an uneven aged management project, then the barely adult trees slated for cutting must be retained along with the younger trees that were shown to be coming up in this lot.
- Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

#### OMSF Day Use Area (October Mountain State Forest)

- Taking all of the white ash greater than 12” DBH is neither essential for forest health nor favorable for it.

- There has been no documentation presented to the public that Emerald Ash Borer (EAB) is rampant; there is a history of exaggeration on the part of state foresters who are motivated to sell a timber contract. For example, on
- Even if EAB is widespread, taking a passive management approach is likely to result in the survival of resistant specimens, a highly important process to allow and one which has been thus far shown to be more efficient by natural forest resistance than in a laboratory.

Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

#### Horse Valley Lot (Huntington State Forest)

- I suggest Proforestation for this healthy, significant lot. On June 1st at 4:35 p.m., Mr. Hill told us, “I don’t know a lot about Proforestation.” This is a favorable management approach that is critical to our survival of the Climate Emergency. I suggest that all of these projects should be put on hold until the head of our Management Forestry Division familiarizes himself with this essential concept.
- Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.
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#### Erving Red Pine (Erving State Forest)

- During the public meeting, I asked Mr. Hill why there is any project planned in the Eastern CT Valley district while there remains no current Forest Resources Management Plan. He skirted the question by speaking of conformity with management guidelines. That is not the point. I submit that there should be NO DCR ACTIVITIES except those immediately required for safety under the agency completes the process submission and approval of such plan by the Stewardship Council, after genuine consideration of public comments. This is a DCR regulation that is being violated.
- Keith DiNardo stated that removing red pine could create a “windthrow” that would threaten white pines near the garage. In other words, the domino effect of “management” requires more management, i.e. the destruction of healthy, mature white pines. In that case, the red pines should absolutely not be cut but monitored for safety and removed piecemeal by DCR personnel when and only when they are fully dead.
- Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not

engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

Hubbard River East Lot (Granville State Forest)

- Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

Goodale-Chipman Lots (Marlborough-Sudbury State Forest)

- It is not clear that white pine thinning is necessary for the health of this forest. The trees should be left to their own devices; if one fails, it will become a fantastic snag for wildlife. Unless there is a safety issue, these trees should be left. This area is naturally wild, and need not be tailored into rec area tidiness.
- Above all else, my concerns are for the carbon that will be released by this project, and of equal importance, the future sequestration that will not be performed due to the removal of trees that were providing that service. The only “carbon benefits” that the DCR can claim are those given by the forest, not engineered by human intervention. In the short-term, no one can claim that there is a benefit to forest carbon by this project.

Submitted by Gia Neswald, Turners Falls, MA

From: fergus marshall  
Sent: Wednesday, June 3, 2020 10:02 PM  
To: Comments, Timber (DCR)  
Cc: Michael Finn; James Welch  
Subject: Public Comments

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Jessica Rowcroft, Project Manager  
Massachusetts Department of Conservation and Recreation 251 Causeway  
Street Suite 700 Boston, MA  
02114  
RE: Comments on Seven DCR Proposed Forest Management Projects

Dear Ms. Rowcroft,



I am commenting on the seven DCR proposed Forest management projects . I am very concerned about the whole management project and believe it is mostly driven by a scheme to satisfy the needs of the logging industry and biomass industry.

Latest science in healthy forests says that intact forests support more biodiversity and resilience than those that are actively managed. They also support a more complex array of soil organisms. When forests are logged it leaves them impoverished and fragmented allowing for erosion and loss of nutrients also letting invasive species to get a foothold.

I truly enjoy walking in the forest and lately had the privilege to visit a forest that hadn't been logged right here in Massachusetts. It was a wonderful experience that I won't soon forget. Many of the state forests that have been logged / managed just don't have the same feeling of being and in many parks and forests the trail systems are compromised.

Another point I want to make is about climate change and the emergency it presents. Nearly all scientists world wide agree that it's happening and it's mostly due to human activity, yet we are continuing to drag our feet to do much about it. This has been going on for forty or fifty years. The Intergovernmental Panel on Climate Change has said that if we are to survive on a livable planet we must keep our forests intact and plant more. This is the new science and we must pay attention. When we cut our forests we introduce a lot of carbon into the atmosphere.

It takes decades for the recovery, that's time we don't have. If we had taken seriously the warnings of NASA scientist, James Hansen, in the early 1980's we wouldn't be in this emergency today.

We are also experiencing a mass sixth extinction that is being driven by losses of forests and encroachment of human populations into rural environments, strongly suggesting the link to deadly viruses such as SARS, Covid2,4 and 19.

The DCRs management is business as usual using outdated science and buying into the industry's claims that we must save the forests by cutting them down. I would like to see a sizable defunding of this program. Not only to save the forest and the world, but also to save Massachusetts taxpayers who are struggling with this new economy.

Thank you for the opportunity to comment,

Fergus R Marshall  
Chicopee Ma 01013

**From:** Glen Ayers  
**Sent:** Wednesday, June 3, 2020 9:50 PM  
**To:** Comments, Timber (DCR)  
**Subject:** 2020 Public Lands logging comments

Dear DCR Timber Comments,

Please add these supplemental comments to those comments that were previously submitted by myself and others on April 16, 2020.

1. I am strongly opposed to all of your proposed Public Lands forest degradation projects. For the record, the facts show that your proposals violate several laws, regulations, and guidelines. I believe these violations are intentional and are being done with malicious intent, as you have been made aware of your violations by numerous individuals, in writing and in court. The proposed projects should be put on hold until the Wendell case is resolved. If you continue to shove these illegitimate projects down the throats of the public, we will resist you in every available way.
2. The DCR Management Forestry Program should be completely shut down, immediately, and no further forest degradation projects should be planned or implemented by this illegal, unentical, and immoral branch of the State Government.
3. The so-called "Public Participation Process" that has been concocted by Bill Hill and DCR is a despicable perversion of the standard planning process and has no legitimacy. The sham process that you follow allows the public to submit comments that are routinely ignored, dismissed, or belittled by the agency. There is no substantive or meaningful mechanism for legitimate public input, only a manipulated process that ensures the public has limited access to information during the comment period due to the incompetence, either intentional or otherwise, of the Management Forestry Staff, including the Program Director. The entire public participation process is a joke and an insult to the citizens of the Commonwealth, the real owners of our Public Lands.
4. The proposed forest degradation projects are a violation of the Public Trust. DCR is engaging in intentional climate crimes, while continuously refusing to address the Climate Emergency. When confronted with science, the Director of the Management Forestry Program regurgitates excuses and misinformation, then slings some convenient buzzwords in a feeble attempt to deflect the legitimate concerns raised by the public. All the while the agency continues to refuse to address, in any substantive manner, the directives outlined in the MA Global Warming Solutions Act. DCR has refused to disclose the climate impacts from its long history of forest degradation, and continues to refuse to conduct any analysis of the obvious climate impacts from proposed projects. By doing so you are climate deniers.
5. The process used by DCR to "approve" these forest degradation projects violates the MA Administrative Procedures Act and the regulations found at 801 CMR 1.00. The process is designed to intentionally deny any access to administrative remedies, once the public comment period has ended.

This process is corrupt and the people administering the bogus process are intentionally violating our right to due process.

6. The process used by DCR to "approve" its own plans is a self-serving abomination with zero legitimacy, even though DCR claims to "consult" with other self-serving officials and agencies. This sort of government corruption is beyond outrageous, it is corrupt and criminal.

7. The process used by DCR to "approve" and implement these forest degradation projects also violates DCR's own regulations found at 302 CMR 11.06 in that DCR never adheres to the requirement clearly specified in these regulations which require that all contractors operating on Public Lands under the control of DCR may only operate under a legitimate Construction and Access Permit, which is appealable under the regulations in accordance with Chapter 30A and 801 CMR 1.00. It appears that the Management Forestry Program has never followed their own regulations in this regard. By failing to follow your own regulations, you are intentionally depriving the public of due process and administrative remedies which are provided by these regulations. This in an intentional act by the Director of the Management Forestry Program and disciplinary action should be taken by the Agency to correct this criminal conduct.

8. Personel from the DCR Management Forestry Program and from other programs within DCR have provided false statements to the State Police, which is a criminal offense, by claiming that the logging in Wendell State Forest was done in a legitimate manner and that all required permits had been issued prior to the initiation of the forest degradation project. Based on this false and perjured testimony, the DCR personnel in their individual capacity, acting under the color of law, abused their authority and violated the constitutionally protected rights of peaceful protesters by lying to State Police in order to fabricate the arrests of 17 individuals under false pretenses, violating their 1st Amendment, their 4th Amendment, their 5th Amendment, and their 14th Amendment rights. These corrupt government employees will be held accountable for these civil rights violations. This matters in the present because these same employees, acting as individuals are currently planning this next round of projects which will cause further harm to the citizens of the Commonwealth, thus establishing a pattern and practice of civil rights violations.

9. There is something terribly wrong with the Management Forestry Program at DCR. It is a malignant cancer on a once proud agency, and it is eating out the heart of DCR, rotting the foundation of the agency, creating discord and division within the workforce, misdirecting scarce fiscal resources by stealing them from other more deserving programs at DCR, and wasting appropriation while ripping off the taxpayers.

Thank you for entering these comments into the record for the 2020 DCR Public Lands Forest Degradation Program. We will not rest and we will not pause, until the persons responsible for this corruption are held accountable and the Management Forestry Program at DCR is completely dismantled. You had your chance to correct your past bad behavior, but that attempt was a miserable failure, which you called the Forest Futures Visioning Process. Your abuses will come to an end. We intend to stop you.

Sincerely,

Glen Ayers  
Greenfield, MA 01301

**From:** Bart Bouricius <canopy.bart@gmail.com>  
**Sent:** Wednesday, June 3, 2020 5:28 PM  
**To:** Comments, Timber (DCR); Gia Noir; Glen Ayers; Bill Stubblefield  
**Subject:** cutting plan comments

To whom it may concern,

I was planning on commenting on the Erving State Forest Cutting Plan and webinar, but because there is no forest inventory yet, or proposed State expenses for the plan, I have inadequate information to be able to address the issues I am focused on in the allotted time. Since the comments are required by midnight of the day of the informational webinar on the projects, and necessary information for me to make comments will not be available by midnight, my comment is that this process is not legitimate. You need information in a timely manner to make comments. Also the DCR sound system simply did not function for most of the Erving State Forest presentation, and for most of the Q and A part as well, but important information also simply was unavailable regardless of this technical mess. There is really no meaningful public process.

Sincerely,

Bart Bouricius  
Montague, MA

**From:** denis mahoney  
**Sent:** Wednesday, June 3, 2020 4:39 PM  
**To:** Comments, Timber (DCR)  
**Subject:** DCR Forest Management Projects presentations of 6-1-20 and 6-3-20

Thank you for the virtual DCR Forest Management Projects presentations of 6-1-20 and 6-3-20.

The presentations did not discuss the creation of longer lived forests. The benefits older aged forests (150 years and more) provide for carbon sequestration is well known.

Our Massachusetts forests provide a significant opportunity for carbon sequestration to aide the Massachusetts decarbonization efforts. All future DCR forest projects need to specifically include the objective of increasing carbon sequestration on these lands.

Denis Mahoney

Holden MA

**From:** denis mahoney  
**Sent:** Monday, June 1, 2020 5:11 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Unanswered Questions From Today's virtual DCR Forest Management Projects presentation

Thank you for the virtual DCR Forest Management Projects presentation today 6-1-20.

During the presentation I submitted two chat questions to the presentation host which were not addressed, both of which had to do with what objectives have been set to create *longer lived* forest. Creation of new growth forest and it's benefit for certain species was discussed extensively. However, there was no discussion of the benefits older aged forests (150 years and more) provide for carbon sequestration.

Similar questions related to carbon sequestration were answered by saying that carbon sequestration is part of the "landscape" DCR objectives and do not relate to individual projects. I find that answer simply evasive. If all of the individual Forest Management projects undertaken by the DCR do not include "landscape" objectives, then there is in fact no "landscape" DCR carbon sequestration objective.

I would hope that the next presentation openly responds to any questions related to carbon sequestration objectives and benefits.

Thank you.

Denis Mahoney

Holden, MA.

**From:** Kenneth Conkey  
**Sent:** Tuesday, May 26, 2020 9:14 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Timber Comments on 2020 DCR Forest Management

We all should embrace forest management for the purpose of carbon sequestration, regeneration of native species and wildlife habitat. All of the proposed projects are a very positive step toward maximizing carbon storage, regeneration of forest products as well as wildlife habitat. Thank you DCR!

**From:** matt hochkeppel  
**Sent:** Thursday, April 16, 2020 2:14 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Stop cutting down the MA woods

Cutting down MA trees for what? Have you heard of climate change? Do you deny it?

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Thursday, April 16, 2020 11:05 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Request for a moratorium on logging of state-owned lands in MA

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**From:** Ralph Baker  
**Sent:** Thursday, April 16, 2020 10:44 AM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Request for a moratorium on logging of state-owned lands in MA

Dear Ms. Rowcroft,

I am writing to ask for a moratorium on logging of state-owned land. I have expressed this view in past comments and signed on to letters to the MA Department of Conservation and Recreation (DCR) on this issue in the past. As an environmental scientist who has spent my career in private industry focused on protecting our environment, this is very important to me, to my family, colleagues and community.

I believe that preserving all of our state forests, as promoted by H. 897, An Act Relative to Forest Protection, would bring much higher ecological and economic benefits to the Commonwealth than continuation of conventional (active) forest management does. Given the urgency of averting the global and regional damage that has and will occur to our environment and economy as a result of the dual and interconnected threats of climate change and loss of biological diversity, I feel that we must cease business-as-usual approaches to forest management that reach decisions on our forests primarily from the standpoint of potential extractive value, as promoted by timber, hunting and fishing interests. We must prioritize instead the importance of maintaining and increasing the storage of carbon in our forests, as well as fostering and preserving their biological diversity to help restore the balance of life on Earth.

Research is indicating that the Covid-19 pandemic, as well as other viruses and diseases threatening human lives here and throughout the globe originate from zoonotic spillover from wild animals to humans, exacerbated by forest destruction and man imposing his imprint on every square mile of the

planet. Covid-19 is yet another loud message that we need to leave large portions of the Earth for nature and natural processes, if we wish to sustain our own survival.

DCR's various proposed logging operations will be detrimental to carbon sequestration and storage – the preponderance of the carbon currently stored in those forests will be quickly emitted back into the atmosphere as a result of these operations – many times more than will be sequestered by the growth of replacement trees within the next crucial decades. The tons of carbon emitted by logging will also be many times more than will be sequestered in wood products derived from these operations. Also, the net impact on ecological integrity of these logging operations (a number of which I have personally observed) will be highly negative. Too often logging operations allow the introduction of invasive species into our forests, as well as leading to excessive runoff, erosion and sedimentation. Nor does the Commonwealth on net appear to derive income from these operations, and even if it did earn a small amount from them, it would be much better to leave these forests to natural processes, similar to what we do within our National Parks. There is an abundance of privately-owned forest land in MA, which can be managed or not managed, per the goals of their individual landowners. These are public lands! The state does not need to act as if it is a private landowner.

In conclusion, cease logging on state-owned lands!

Kindly acknowledge receipt.

Sincerely yours,

Ralph S. Baker, Ph.D.  
Fitchburg, MA

**From:** Sonny Boy  
**Sent:** Thursday, April 16, 2020 8:28 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Massachusetts Forests

To Whom Our Forests

I am writing this in a plea for the state to stop the harvesting of timber in Massachusetts State Forests.

In my opinion-and I'm guessing- the opinions of thousands of Massachusetts residents, carbon sequestration is best achieved by leaving our forests alone. We do not have the luxury of a 70+ yr. timeframe to experiment with the highly questionable model currently used to "manage" our state's forests. The forests did just fine without human interference and they will do just fine without our meddling into the distant future.

Sincerely,  
Walt Burnham  
Montague, MA.

**From:** Salvatore Raciti

**Sent:** Wednesday, April 15, 2020 11:56 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on DCR's 2020 Forest Management Projects

Jessica Rowcroft, Project Manager  
Massachusetts Department of Conservation and Recreation  
251 Causeway St., Suite 700  
Boston, MA 02114

Dear Jessica, I'd like to add my name to the growing list of those working to protect our forested land. I would urge a moratorium be placed on all logging in state forests, at least until experts can present arguments defending the value of the essential habitat and improved soils in mature forests. This, and the myriad of recreational benefits, increased carbon stores, and tremendous levels of sequestration. Who could have anticipated that Massachusetts forests would someday be the envy of the world? It is my fervent hope that all of our State Forests be placed into a Reserve status and allowed to mature indefinitely. I spend so much time in the Savoy State Forest and the Mohawk Trail State Forest (literally live between them) that I have grown in appreciation of mature wild land and know the DCR takes a special pride in all of these wonderful forests. Frankly, I find it difficult to understand why stands of established forest should be logged for any reason.

When we finally evolve from the disruptions of COVID-19, perhaps we will have grown in awareness of real protections afforded by maturing forests and, for the sake of the State as well as the planet, recognize and safeguard the treasures we have.

Sincerely,  
Salvatore Raciti

Salvatore Raciti

*MemoryCollective in the Brier*

**From:** Kate O'Connor  
**Sent:** Wednesday, April 15, 2020 6:40 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Forest proposal

- Dear Massachusetts Department of Conservation and Recreation (DCR),



We am writing in opposition to the 1018 acres of timber removal proposed for year 2020. We are losing old growth forests at an alarming rate in a time of dire need and by so doing contribute to climate change. Here are the reasons we oppose this proposal:

These tree removal projects are completely unnecessary for forest health and do not serve any public good.

Large, intact forests maximize carbon sequestration and storage; older trees sequester more carbon than younger trees and their rate of drawdown increases year by year.

- Protecting existing forests is an effective, **immediate**, and low-cost approach to slowing climate change.
- Healthy forests create healthy soils and healthy soils are critical for carbon drawdown. The bulk of stored carbon is found below ground in the soil; the above ground and below ground carbon cycle dynamics are interdependent.
- Burning wood is **not** carbon-neutral. We've got to stop burning for heat and power and move to true renewables like solar and wind.
- Large, natural, undisturbed tracts of forest promote biodiversity better than managed forests.
- Forests have managed themselves for millennia. The DCR needs to stand aside and let our state-forests reach their full potential naturally without human intervention.

Please record our opposition to this proposal.

Sincerely, Kate O'Connor and Frederick Spence, Westhampton,  
Massachusetts

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Wednesday, April 15, 2020 5:33 PM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Moratorium on logging on public land

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**From:** Ellen Moyer  
**Sent:** Wednesday, April 15, 2020 5:29 PM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Moratorium on logging on public land

Dear Ms. Rowcroft – I support a moratorium on logging on public land. We need to put citizens and the environment ahead of the timber industry right now.

Thank you,  
Ellen

Ellen Moyer, Ph.D., P.E.  
Principal  
Greenenvironment, LLC

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Wednesday, April 15, 2020 5:19 PM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Moratorium on Logging

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**From:** Stephanie Jo Kent  
**Sent:** Wednesday, April 15, 2020 4:51 PM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Moratorium on Logging

Hello Jessica,

I've referred to you in writing recently, in a comment submitted to the EOEEA on the 2050 Roadmap. That comment is also available as an "open letter" and is embedded in this comment which I have just sent to DCR (and also published online).

Please accept my regrets in advance for the plain language I'm using in assessing the integrity of DCR with regard to the public comment process. I have no idea what decision-making role or

authority you have, my guess is not very much! The argument presented here and in the 2050 Roadmap comments all support a moratorium for logging on State lands. There is a bill that passed favorably out of the House and is supposedly embedded with other bills in an omnibus forest management package being considered in the Senate. Whether or not the bill gets enacted this year, it is coming. We can help ourselves *so much* by stopping now.

I hope you will exercise whatever influence you have in service of protecting the woods, for all our sakes but especially the children and grandchildren.

Here is the text of an open article that I have already emailed as my comment against all eight of the logging projects announced to the public for 2020. I hope that I am wrong in my assessment that public comments will be ignored. As mentioned above, the arguments here apply to all forests in Massachusetts, including those that are privately owned!

## [Over 1000 acres of Massachusetts' Forest to be cut by DCR in 2020](#)

The Department of Conservation and Recreation for the Commonwealth of Massachusetts is once again planning [several cutting projects](#). Although the *process* allows for "public comment," this is just going-through-the-motions. Based on past history, DCR has no intention of allowing public or scientific feedback to influence their plan. Take, for instance, the Wendell State Forest, where DCR allowed a private logging company to totally decimate a mid-age, beautifully diverse forest of the exact composition we need, despite [concerted and heroic efforts by citizens who jumped every hoop to communicate](#) the absolute necessity of keeping our forests intact and allowing the trees in them to *grow old*.

We need to keep alive as many big old trees as possible because the oldest, largest trees sequester the most carbon. The reason that we need to preserve and increase the age and density of the forest in Massachusetts is because forests across the United States and around the world are in far worse shape! What this means is that our forest, this remnant of what used to be a massive woodlands covering the entire northeastern United States, *has to pick up the slack for the atmosphere*. In other words, Massachusetts' forests are *an ecosystem service* for our entire state, all of the country and the entire globe.

The language that DCR uses to justify the need for logging is euphemistic at best. For instance, they say they want to salvage trees that are diseased or over-run with insect pests. However, trees that succumb to natural forces (illness and old age) are part of the cycle of nature's patterns of restoration. So-called "declining" tree species contribute through decomposition, ensuring the renewal of healthy ecosystems. Invasive pests may periodically be a concern but that is a special case which should have very tight controls, not an annual reason for taking out healthy trees in the beginning or middle of their life expectancy. Likewise any efforts that supposedly improve recreational experiences ought to be restricted to minor maintenance of existing trails and parks, not an excuse or rationale to justify cutting down more trees than absolutely necessary for the safety of hikers and skiers, whether they be tourists or locals.

DCR says it wants to improve forest resiliency. That's just baloney, people. So is something they call energetic regeneration. This is the hype machine, an extension of fake news, classic examples of management by euphemism.

At worst, the reasons are blatantly profit-motivated, such as to "control" the growth of species of trees that they can't harvest and sell. DCR presents the case that whatever trees are left will be adequate for sequestration, purposely downplaying the role of our forests in drawing down emissions (see this [Open Letter on Proforestation, to the Massachusetts Executive Office of Energy and Environmental Affairs](#)).

The bottom-line is that DCR is trying to do business-as-usual, using an outmoded, cookie-cutter rationale that slaps convenient language onto practices that are detrimental to the welfare of the Commonwealth. There no doubt *are* skills and talents that foresters can bring to improving the robustness of our forest. DCR, the Executive Office of Energy and Environmental Affairs, and the rest of the administration must start listening to and following the advice of those who are showing us the way out of this mess, rather than protecting vested interests by following established habits that no longer serve the best interests of Massachusetts.

Respectfully,  
steph

--

Stephanie Jo Kent, CI, PhD  
Community Interpreter (ASL/English)  
Learning Lab for Resiliency®

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Wednesday, April 15, 2020 5:18 PM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: 2020 timber sale process violates DCR policy and Administrative Procedures Act

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**From:** Glen Ayers  
**Sent:** Wednesday, April 15, 2020 4:59 PM  
**To:** Comments, Timber (DCR); Rowcroft, Jessica (DCR)  
**Subject:** 2020 timber sale process violates DCR policy and Administrative Procedures Act

Dear DCR,

I want to go on record as strongly opposing your efforts to shove the seven 2020 Public Lands logging projects down the throats of the citizens of the Commonwealth after you postponed/cancelled the public tours and info sessions, due to the COVID-19 pandemic, and yet you would not halt the process or likewise extend the public comment period. This is wrong and

I will consider filing a court action to enjoin DCR from conducting further timber sales on Public Lands until you have followed your own (fake) public participation process.

Please enter this into the record for the 2020 logging program.

Sincerely,

Glen Ayers  
Greenfield, MA 01301

**From:** bill copeland  
**Sent:** Wednesday, April 15, 2020 5:01 PM  
**To:** Comments, Timber (DCR)  
**Subject:** DCR logging on state forestland

With the exception of removing the poorly thought-out plantations, I am opposed to most of the DCR logging projects proposed for 2020 on the grounds that so-called improvement forestry does not benefit anyone but the forest industry, least of all the true owners of the land, the citizens of the state. We could enjoy these lands better if they were left to develop fully into mature, complex, high-carbon, high diversity forests connecting wildlife populations and harboring rare and sensitive species. Something managed forests do not do.

Bill Copeland

**From:** JOHN MCDONALD  
**Sent:** Wednesday, April 15, 2020 4:44 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on proposed forest management actions

To Whom it may concern,

I was just informed this week of the comment period on several forest management proposals, which ends today. I am writing to support the proposals in the Northern, Central, and Southern Berkshires. I have had a chance to review the proposed actions and desired future conditions on each of those proposals and find them highly appropriate for the local conditions and the landscape of western Massachusetts. Removing diseased or insect damaged trees, creating young forest patches, and applying shelterwood and group selection silviculture are all appropriate and necessary actions to enhance forest diversity and create habitats for wildlife that depend on both young and mature forests.

Thank you for the opportunity to comment,  
John McDonald

--

Dr. John E. McDonald, Jr.

Past-President and Fellow, The Wildlife Society  
Associate Editor, *Wildlife Society Bulletin, Journal of Wildlife Management*, and *Ursus*  
Associate Professor, Department of Environmental Science, Westfield State University

Check out the Northeast Section TWS Field Course: <http://wildlife.org/ne-section/about/student-field-course/>

From:  
Sent: Wednesday, April 15, 2020 3:42 PM  
To: Comments, Timber (DCR)  
Subject: Comments - DCR Forest Management Projects

Jessica Rowcroft, Project Manager  
Massachusetts Department of Conservation and Recreation  
251 Causeway St., Suite 700  
Boston, MA 02114

4/13/20

Re: Comments on DCR's 2020 Forest Management Projects

Ms. Rowcroft,

I was dismayed to see that the DCR has come out with yet another plan for cutting our forests. In an era of climate change where we face viruses, insect plagues, sea level rise, no snow and severe weather, the DCR still wants to continue logging our critical carbon sink.

We must preserve Massachusetts' carbon dense forests for sequestration. This should be a major part of the Global Warming Solutions Act to reduce our carbon emissions. Logging another 1,000 acres of Western Mass's forests is very destructive, releases a lot of carbon and serves very little beneficial purpose. In addition, such logging forfeits the future carbon storage of those trees.

The DCR is still functioning on an operating model from the 1940's and 50's where logging seems to be its main preoccupation. The agency needs to refocus its mission for the 21st Century and become a steward of our forests by studying sequestration, identifying endangered flora and fauna, enhancing recreational opportunities and monitoring access to our forest lands.

The DCR should step up its game and retool its direction toward addressing immediate climate resilience while creating more recreational opportunities. A logging moratorium may be needed to assess Massachusetts' commitment to its state forests.

I hope the DCR will rethink its forestry management plans for 2020 and eliminate logging from its mission.

Respectfully,

Susan Purser  
Becket, MA 01223

**From:** Rick Lent  
**Sent:** Wednesday, April 15, 2020 12:19 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on proposed 2020 projects

DCR has previously acknowledged scientific studies, which have found that uncut forests sequester more carbon than logged forests. While any retained trees will, of course, sequester some carbon, the proposed logging projects would result in significantly less carbon sequestration than if the forest were simply allowed to grow. This is especially important in Massachusetts, which has some of the most carbon-dense forests in the Northeastern United States that also have a large potential for future growth.

A young forest recovering from logging will sequester carbon, the amount will be less than if the existing trees were allowed to grow. Recent studies show that forests increase the rate of carbon sequestration as they age. By cutting many, if not all, mature trees, the proposed logging projects would release massive amounts of carbon and set back the amount of new carbon sequestration for decades. Furthermore, logging can cause a gradual release of carbon from soils that lasts for decades after the logging is complete.

The 2008 Massachusetts Global Warming Solutions Act (GWSA) called for dramatic reductions in greenhouse gas emissions beginning in 2020. The 2018 report of the UN Intergovernmental Panel on Climate Change (IPCC) warned that we need to dramatically address climate change by 2030, including not only reducing greenhouse gas emissions from energy production, but also absorbing and storing carbon from the atmosphere — with forests playing a critical role. In 2019, Governor Baker reaffirmed a commitment with 24 other governors in the U.S. Climate Alliance to the goal of sequestering more carbon in forests as a way to mitigate climate change. In 2020, the MA senate voted in favor of bills to reduce MA climate emissions to net zero by 2050. Forests with older trees will be particularly important to these achieving these goals.

Rick Lent, Stow MA  
[Elders Climate Action-Mass](#)

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Wednesday, April 15, 2020 9:55 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw:

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**From:** Terisa Turner

**Sent:** Tuesday, April 14, 2020 8:09 PM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:**

We need an immediate moratorium on logging on public lands. DCR's unit that promotes this rape needs to be defunded.

Sincerely,

Terisa E. Turner

Terisa E. Turner PhD (LSE)

**From:** Laura Bentz  
**Sent:** Wednesday, April 15, 2020 9:52 AM  
**To:** Comments, Timber (DCR); Rowcroft, Jessica (DCR)  
**Subject:** MORATORIUM please, on Proposed Forest Management Plan

Forest management has never been more critical, than now. My first wish would be, for a moratorium on ANY "logging" on state owned sites. This is primarily due to the emerging science, about the enormous amount of carbon sequestered by trees, the older they get. I urge you, in strongest possible terms, to make use of GOOD sound science, as you manage our forests.

I understand that these are the goals of the current Mass Forest Management Plan:

1. "Salvage" trees with Insect pests and disease, and "control" "excess proliferation" of non-commercial species
2. "Improve" wildlife habitat, biodiversity, and forest "resiliency"
3. Remove "declining" Norway spruce plantations
4. "Sequester" carbon in "retained" trees, "solid" wood products, and "energetically regenerating" forest
5. Provide "locally grown" forest products to the "local" economy
6. "Improve" recreational experiences

Again, my first thought is to urge a moratorium.

If a moratorium will not happen, then please, take these comments into account:

I notice immediately, that there is potential conflict between points 1 and 2, since some if not many insects feed other birds and mammals also inhabiting the Mass forests!; there is also potential conflict between points 4 and 5: I would hope that increasing scientific findings, about the greatly increased amounts of carbon sequestered in older trees, would be a hugely guiding force in decisions regarding forest "harvest". Providing local forest products should not, in a time of climate crisis, be used as an excuse for harvesting trees which are sequestering enormous amounts of carbon, the older they get!



While it is easy to imagine that "improving recreational experiences" would include removing hazard trees, near parking lots and picnic areas, I would again hope that any removal of trees to improve human visitor experiences would be done extremely mindfully! And, perhaps there is a way to remove trees near picnic and park structures, that can provide local wood products?

Finally, if declining spruce plantations need to be removed, I would urge foresters to work with local botanist and etymologists, to seed newly open areas of forest with flowering plant species that can also support our declining pollinator insect populations!

There has never been a time, in my own 57 year life time, that has called out for creative problem solving, using available scientific understanding about ecosystems writ large, more than now.

I urge you and all involved in managing Mass forests to proceed mindfully, in this time of pandemic and ecological crisis. Perhaps any "slowdown" in proposed logging will yield important data, about the benefits to humans and others, of NOT logging.

Respectfully yours,

Laura Bentz  
Williamstown, Berkshire county, MA

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*"We humans are meant to be connected to each other and to the earth. When we are disconnected we create grossly unequal societies that harm humans and harm the earth."* - paraphrase of Marama Davidson, Maori member of the New Zealand Parliament

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Tuesday, April 14, 2020 11:46 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Logging moratorium

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**From:** Nathalie Bridegam  
**Sent:** Tuesday, April 14, 2020 11:10 AM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Logging moratorium

I am in strong support of a moratorium on logging state-owned land. As tree expert, Robert Leverett, has pointed out, ancient trees sequester more carbon than younger trees though ALL are important to helping reduce the carbon load which is the most significant cause of global warming.

Please, our forest are our treasures for this and future generations.

Nathalie Bridegam

**From:** annelouise smallen  
**Sent:** Tuesday, April 14, 2020 10:35 AM  
**To:** Comments, Timber (DCR)  
**Cc:** Farming Forests Food Systems  
**Subject:** Comments on 2020 proposed deforestation

- I am writing in opposition to the 1018 acres of timber removal proposed for year 2020. We are losing old growth forests at an alarming rate in a time of dire need and by so doing contribute to climate change. Here are good reasons to pause about this proposal:

Large, intact forests maximize carbon sequestration and storage; older trees sequester more carbon than younger trees and their rate of drawdown increases year by year.

- Protecting existing forests is an effective, **immediate**, and low-cost approach to slowing climate change.
- Healthy forests create healthy soils and healthy soils are critical for carbon drawdown. The bulk of stored carbon is found below ground in the soil; the above ground and below ground carbon cycle dynamics are interdependent.
- Burning wood is **not** carbon-neutral. We've got to stop burning for heat and power and move to true renewables like solar and wind.
- Large, natural, undisturbed tracts of forest promote biodiversity better than managed forests.
- Forests have managed themselves for millennia. The DCR needs to stand aside and let our state-forests reach their full potential naturally without human intervention.

Please record my opposition to this proposal.

Anne-Louise Smallen

Northampton MA

**From:** Lexi Allaway  
**Sent:** Tuesday, April 14, 2020 8:43 AM

**To:** Comments, Timber (DCR)  
**Subject:** MA DCR Comment

Hello,

I would like to comment that:

- The DCR must enact an immediate moratorium on logging of our state-owned forests. Cutting our state-owned forests for “management” and wood production is outmoded and short-sighted.
  - Large, intact forests maximize carbon sequestration and storage; older trees sequester more carbon than younger trees and their rate of drawdown increases year by year.
  - Climate chaos is happening now! Protecting existing forests is an effective, **immediate**, and low-cost approach.
  - Healthy forests create healthy soils and healthy soils are critical for carbon drawdown. The bulk of stored carbon is found below ground in the soil; the above ground and below ground carbon cycle dynamics are interdependent.
  - Burning wood is **not** carbon-neutral. We’ve got to stop burning for heat and power and move to true renewables like solar and wind.
  - Large, natural, undisturbed tracts of forest promote biodiversity better than managed forests.
  - Forests have managed themselves for millennia. The DCR needs to stand aside and let our state-forests reach their full potential naturally without human intervention.

Sincerely,  
Lexi Allaway

From: Priscilla Lynch  
Sent: Monday, April 13, 2020 3:39 PM  
To: Comments, Timber (DCR)

Subject: 2020 timber proposals

I am writing to express my strong opposition to the timber cutting proposals for 2020. At this point in the ongoing Climate Emergency it is neglectful and "criminal" to be continuing to log our state lands. The value our forests offer in terms of carbon capture and sequestration and in biodiversity can not be ignored for the benefit of commercial logging. Your plans do not address the present Climate Emergency in anyway. These proposals are creating an overall loss for our climate and the citizens who own this land. These proposal are not proposals formulated in the best interests of the citizens or in the spirit of the Global Warming Solutions Act.

In addition, the money which the state obtains from these contracts is less than the administrative costs of facilitating these projects. The citizen owners of the land loose money on your proposals.

Other problematic DCR practices include proposals for logging in reserves.

To proceed with these proposals in this time of a pandemic when forest tours could not be held is irresponsible on the part of DCR. This is not business as usual time, or is it?

Priscilla Lynch  
Conway, MA. 01341

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Monday, April 13, 2020 7:46 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: state forest logging moratorium

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**From:** Gloria Kegeles  
**Sent:** Monday, April 13, 2020 1:07 AM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** state forest logging moratorium

Please put a moratorium on logging in the state forests.  
We need to have forests which are undisturbed for wildlife and humans.

We cannot do what we just did with COVID-19, namely wait to act when it's too late to act, in this case to turn climate change around.

Forests are the only thing we have to sequester carbon and pull carbon out of the atmosphere. The older the tree, the MORE net carbon it

sequesters each year. New trees are no replacement, in the time required.  
We have less than 10 years to address climate change,  
after which it will be irreversibly spiraling out of control.

Our children will lead miserable lives of running from one climate catastrophe  
to another (and so will we, many of us in our old age).

YOU HAVE THE POWER TO SAVE HUMAN LIFE ON THIS PLANET.  
Is money more important in the short term than keeping our planet habitable?

Please don't be afraid of angering those who receive large political contributions  
from the forest industry. The people are more powerful than they are.

Thank you,  
Gloria Kegeles  
Wendell, MA

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Monday, April 13, 2020 7:45 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Logging in MA

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**From:** Rebecca  
**Sent:** Sunday, April 12, 2020 6:21 PM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Logging in MA

Dear Jessica,

I support a total and permanent moratorium on all logging (*managed* or otherwise) in MA state owned forests. We do not need managed forest projects. We need to let the forests regenerate as nature intended and as the planet requires for carbon sequestration. Count me as another person in western MA who lives amongst the trees and understands how they support each other and the ecosystem consisting of other plants, animals and the air quality, as a complete MA forest system. Please do the right thing - not the thing that brings revenue. Thank you for the comment period.

Best regards,  
Rebecca Hull  
Amherst, MA

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Monday, April 13, 2020 7:45 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Stop Logging on State Land

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**From:** Christopher Queen  
**Sent:** Sunday, April 12, 2020 3:37 PM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Stop Logging on State Land

Dear Ms. Rowcroft,

We believe it is time for the Commonwealth of Massachusetts to honor its commitments to its citizens and the future, specifically to acknowledge the scientific consensus regarding carbon sequestration of old growth forests and to stop cutting mature trees on state lands.

A meaningful step in this direction would be to pass a moratorium on commercial logging on State land.

H.897 was carefully drafted to state the case for such a moratorium and to indicate those exceptions for which tree removal was warranted for fire prevention or hiker safety.

In June 2017, Governor Baker joined the United States Climate Alliance, a bipartisan coalition of 17 governors committed to reducing greenhouse gas emissions consistent with the goals of the Paris Agreement. One of the Alliance's major objectives is to "increase carbon stored in forest ecosystems and reduce losses of already-stored carbon."

It is time to treat our State Forests as the federal government treats its National Parks, where logging and mining are prohibited.

Thank you for placing our environment above the profits of the timber industry.

Sincerely,

Dr. Christopher Queen  
Alys Terrien-Queen

Wendell, MA 01379

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Monday, April 13, 2020 7:45 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Moratorium on logging on state-owned lands

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**From:** Paul L

**Sent:** Sunday, April 12, 2020 10:35 AM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Moratorium on logging on state-owned lands

Dear Ms. Rowcroft,

As CO2 continues to climb, threatening us all with a climate catastrophe, we need to protect and preserve our living forests in order to remove CO2 from the atmosphere and sequester it in the soil. See: <https://www.esrl.noaa.gov/gmd/ccgg/trends/>

We should halt logging on public lands.

Paul Lauenstein  
Sharon, MA

**From:** Rowcroft, Jessica (DCR)  
**Sent:** Monday, April 13, 2020 7:44 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** Fw: Logging

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**From:** Laurel  
**Sent:** Sunday, April 12, 2020 9:37 AM  
**To:** Rowcroft, Jessica (DCR)  
**Subject:** Logging

Jessica,

I would like to comment, but I'll let the experts do that. Scientists who have been working to halt climate change like Bill Moomaw have been studying the issue of logging for decades.

Please see

<https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full> and be willing to consider leaving forests intact in order to meet the deadline of the Global Warming Solutions Act. We must allow forests to continue to sequester carbon; nature can fight this battle best, and logging is totally counterproductive. It

is time for a moratorium while the practice of the commercial logging of our state-owned lands is fully explored.

Laurel Facey

**From:** Ken Kipen  
**Sent:** Monday, April 13, 2020 7:26 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments re proposed lumbering

We oppose the extent of the lumbering the state is proposing, Our forests create habitat for wildlife that is lost when logging is excessive. Ken & Ethel Kipen, Ashfield MA 01330

From: Miriam  
Sent: Sunday, April 12, 2020 10:26 AM  
To: Comments, Timber (DCR); Comments, Timber (DCR)  
Subject: upcoming forestry projects

To Whom It May Concern:

I am writing to intervene in the upcoming projects you have put forth in your 2020 plans for logging.

Balance Rock State Park, Lanesbrough 246 acres  
Florida State Park, Florida 107 acres  
October Mountain State Park, Washington 37 acres  
Huntington State Forest, Huntington 174 acres  
Granville State Forest, Granville 330 acres Marlborough/Sudury State Forest, Hudson/ Marlborough 113  
Erving State Forest, Erving 11 acres

I oppose all commercial logging of our state forests for many reasons. As a resident of Western Massachusetts and frequent visitor to state forests, I implore you to save these precious landscapes for public enjoyment and for preservation of forest life. Forest ecosystems are increasingly disappearing for purposes of profit to the forestry industry, increased development, biomass and more. Our state forests, here in Western Massachusetts are precious to all who live here and to the large tourist industry they support. I have read numerous articles stating that we need to keep forests alive and wild if we have any hope of reversing climate change and subsequently preserving life on Earth. It is essential to the majority of residents in Western Massachusetts that we preserve our state forests. Our forests serve



life in so many ways, including cleaning our air and water. They are integral in moderating weather systems and offering us rain. Their rich soils and trees support critical life for many species.

If jobs will be lost, we will need to retrain workers in the forestry industry so they may become employed in practices that enrich our lives instead of the destruction they are now pursuing.

Thank you, Miriam and Mike Kurland Williamsburg, MA 01096

**From:** Miriam  
**Sent:** Tuesday, March 10, 2020 2:35 PM  
**To:** Comments, Timber (DCR)  
**Subject:** public comment

To Whom It May Concern:

I am extremely concerned about your plans for our state forests. The most updated science reveals the importance of our forests. Forests have been and continue to become more and more of an extinct ecosystem. We need to do everything in our power to stop the complete extinction of forests. We need to stop using our state forests for commercial logging. There are many less harmful natural solutions that can be developed and used, including hemp and bamboo. Our intact forests offer a rich habitat for numerous and diverse species of all sizes and needs. The vital rich soils of wild forests should not be trampled on and weakened by the huge machinery that is used in commercial logging. The web of life that connects invaluable diversity, strength, communication and health of the forests lies in the intact soils of wild forests. Keeping our forests intact is the easiest, cheapest and best way to fight against climate change. With the many articles from numerous organizations and scientists are coming out in support of pro-forestation, the public is becoming more and more aware of their importance. Leadership is slow to respond, as those with financial interest in the destruction are responded to more than what is best for the health and well being of life on this planet. This means that those who are passionate in concerns for the life of current and future generations must become stronger, louder and more courageous. We hope that DCR will research this critical and newer science and join those of us who are trying to get leadership to take action to save us from climate change and the stop furthering the loss of state/public owned forested ecosystems.

Thank you,

Miriam and Mike Kurland Williamsburg, MA 01096

**From:** Miriam  
**Sent:** Thursday, May 28, 2020 10:46 AM  
**To:** Comments, Timber (DCR); Podkowka, Kevin (DCR); Massini, Kris (DCR); Anzuoni, Nicholas (DCR); Vautour, Joelle (DCR); Waterman, Michael (DCR); Gregory, Paul (DCR)  
**Subject:** comments on proposed forestry projects

To Whom It May Concern:

Many citizens of Massachusetts are deeply concerned about the commercial logging operations that are going on and planned to occur in our state forests. We employ the agencies in our state government to care for our forests so we may continue to enjoy a future of recreational activity and soulful quiet enjoyment, We need many places where we can hike, kayak, swim and explore. With many acres disappearing for development, our state forests are our refuge, where diverse life abounds and purity can be experienced. Our state forests, if left wild, will clean our air, purify our water and maintain healthy water cycles and ecosystems.

There are many private places where loggers can earn their living. Some loggers may wish to seek new jobs of nurturing our public forests instead of logging them. We can use our tax money for retraining workers to learn Earth friendly skills. Commercial logging in the long run, will cost us more economically and in costs of our health and happiness.

With the newest scientific evidence supporting the importance of preserving our public lands as wild sanctuaries for carbon sequestration and a healthy planet, commercial logging of state lands must stop. It is in the public interest to do so.

Thank you, Mike and Miriam Kurland Williamsburg, MA 01096

**From:** Laurel  
**Sent:** Thursday, May 28, 2020 11:57 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Opposition

Re: Forest Management Projects

Thank you for the opportunity to comment on the forest management projects being proposed by the Department of Conservation and Recreation.

Specifically, the following projects are being considered:

he project located at Florida State Forest proposes to use uneven age and even age management in both mixed hardwood stands and Norway spruce plantations to regenerate native species, Huntington State Forest proposes to use a combination uneven/even age management system (irregular shelterwood) and even age management in hemlock-hardwood stands to regenerate native species; October Mountain State Forest proposes to use even age management in Norway spruce and red pine plantations to regenerate native species; Granville State Forest proposes to use a combination uneven/even age management system (irregular shelterwood) in oak hardwood, hemlock hardwood and northern hardwood forest types to regenerate native species; and the project in Balance Rock State Park proposes to use uneven age management to regenerate native tree species in northern hardwoods, oak-hardwoods and white pine-hardwoods forest types.

In addition, the project in Marlboro-Sudbury State Forest proposes to use even age management system (shelterwood) to regenerate native species in a white and red pine plantation and thinning in pine and oak stands to promote growth. The project in Erving State Forest proposes to use an even age management system to convert a red pine plantation to native oak and white pine.

We object to the basic premises of these logging projects and wish to be on the record as opposed to all of them. We must protect the biodiversity of our native landscapes. Bringing your attention to: <https://www.mass.gov/service-details/ecology-program>, I do not believe that Silviculture Proposals adequately protect native biodiversity.

The pristine beauty of a natural environment is not what is left after a DCR "management" logging job.

Yours,

Laurel Facey, member  
Wendell State Forest Alliance

Patricia Hynes, Director  
The Traprock Center for Peace and Justice

**From:** Lynn Waldron  
**Sent:** Thursday, May 28, 2020 12:59 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Forestry Management projects proposed 2020

To who it concerns,

I am strongly opposed to any cutting in the forests to be discussed on June 1st and 3rd. We cannot provide meaningful feedback without touring the forest in person with the forester. There is no valid reason to proceed with this cutting until citizens have had the opportunity to walk in the forest and ask relevant questions. We are being deprived of our due process. We are in the middle of a pandemic and a climate emergency. Why can't this wait?

Sincerely,  
Lynn Waldron  
Greenfield, MA 01301

**From:** Jodi Rodar  
**Sent:** Thursday, May 28, 2020 1:32 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Please Stop All Logging On Massachusetts State Owned Lands

To Whom It May Concern,

I am writing with great concern to ask immediate moratorium on logging on all Massachusetts state-owned lands, including woodlands, parklands, reserves, and watersheds managed by the Massachusetts Department of Conservation and Recreation, and wildlife management areas managed by the Massachusetts Division of Fisheries and Wildlife, excluding the cutting of trees proven to be necessary to protect public safety. This exception does not include the cutting of trees to prevent or control disease, insect infestations, invasive species, fires, or other natural disturbances, which has not been proven to protect public safety.

Our Massachusetts forests are critical in mitigating climate change, preserving native wildlife and habitats, safeguarding soils, providing clean air and water, and offering public recreation. Logging our forests harms these values, while protecting our forests from cutting enhances them. Keeping our forests standing would allow them to absorb and store carbon at an increasing rate for centuries to come. This would complement the state's goal of reducing greenhouse gas emissions.

Now is the time to revisit our public forest policies to ensure the greatest possible benefit for this and future generations.

The October 7, 2018 report of the Intergovernmental Panel on Climate Change issued a dire warning: To avoid catastrophic climate change, we need to take immediate action to stabilize and reduce the amount of carbon dioxide in the atmosphere. This includes the preservation of standing forests, which are essential in removing and storing atmospheric carbon.

Emerging science shows that if kept intact, forests will absorb carbon at an accelerating rate as they grow older. If they are logged, most of this carbon will be released. None of Massachusetts' state lands have guaranteed protection from logging. This includes areas classified as "parklands" and "reserves," which can be opened to logging with a stroke of a pen by state agencies. We are asking that the approximately 650,000 acres of state land, covering 13% of

the Massachusetts land base, be protected from logging and dedicated to maximizing carbon sequestration under this moratorium.

Conservation biologists call for saving 17% to 50% of the Earth to prevent massive extinction of plant and animal species. The protection of Massachusetts' state-owned lands from logging would be a major step toward safeguarding our state's native biodiversity.

In June 2017, Massachusetts Governor Charlie Baker joined the United States Climate Alliance, a bipartisan coalition of 17 governors committed to reducing greenhouse gas emissions consistent with the goals of the Paris Agreement. One of the Alliance's major objectives is to "increase carbon stored in forest ecosystems and reduce losses of already-stored carbon."

We call on the Governor, along with state agencies, to honor this commitment and enact a moratorium on logging on state lands. Such bold leadership can inspire other states across the country to take similar action to address this vital issue.

Thank you for your time regarding this important issue.

Sincerely,

Dr. Jodi Rodar

**From:**  
**Sent:** Thursday, April 16, 2020 10:17 PM  
**To:** Comments, Timber (DCR)  
**Subject:** DCR Cutting

Greetings,

It is deeply disturbing to me that so many acres off our forest are to be "cut back" when the need for larger trees is so prevalent to air quality and our earth. When will it be enough cutting and where will we draw the line? Watching the news and seeing all these pipelines and things being built even as we have a global pandemic occurring make me wonder where our priorities are. I understand the need to trim back near highways and for safety of hikers along a trail line as minimally as possible. This is a huge amount of

acreage and continues the destruction already rampant in our ecosystems and forests. It doesn't seem wise to keep cutting when we need our older and more diverse trees. They create biodiversity and are a part of the natural cycle of the forest. We need to be wise and weigh options that don't keep cutting our forests. We in New England need them as does the world. Please stop cutting our Earth's lungs.

Aquene, (Native American for Peace)

Deep Water Woman  
otherwise known as Reverend Tasondra Jardine.