

Department of Conservation and Recreation

Bureau of Forestry

Timber Harvest Summary-Public Comment Form

The Timber Harvest Summary card was designed to assist the public in providing information to the Bureau of Forestry when proposed forest management projects are in the initial planning stages.

The following are my comments about the Forest Management Project being proposed at:

Name of Forest Management Project: \_Eastern CT Valley District 05 Brook Road\_\_

State Forest: \_\_Wendell\_\_\_\_\_

Management Forester: \_\_Keith DiNardo\_\_\_\_\_

Forest Health:

I support this Plan and find the recommended treatments to be very constructive and positive for forest health. The Red Pine is diseased and needs to be removed. The White Pine needs management as does the Oak. I trust the professional foresters to make the right decisions.

Wildlife/Rare Species:

I appreciate the sensitivity to wildlife being taken. I especially would like the proposed Brook Road Plan to incorporate the recommendation by DFW to clear cut to create habitat for Whippoorwills. This is Noted under Silviculture for Stand 1. My property is on the other side of Wickett Pond Road from the proposed management along Brook Road. My property was impacted by the tornado of 2006. We moved here in 2011. In 2013 we started hearing Whippoorwills around our property and the adjoining State Forest land on Wickett Pond Road. They have been here ever since and I am very glad about that. I understand that the DFW has established a Route for counting purposes in this area to collect data on the Whippoorwills. I support a series of small clear cuts on this project to create habitat for the Whippoorwill which is a MASS Species of Concern.

Name: \_\_\_\_\_Judith A. Hall\_\_\_\_\_

Address: \_\_78 Wickett Pond Road Wendell, MA 01379\_\_\_\_\_

Phone Number:\_\_\_\_413-834-7389\_\_\_\_\_

Judy Hall

78 Wickett Pond Road

Wendell, MA 01379

From: Ruth McDowell <ruth@ruthbmcdowell.com>

Sent: Wednesday, April 6, 2016 9:07 AM

To: Anzuoni, Nicholas (DCR)

Subject: Sheep Ranch Project

Hi Nick.

I've been reading with interest the proposal for the Sheep Ranch project. John and Marge Gilbert and I took the map of the proposal and drove all over the place to check out all the areas to be cut.

In my opinion, and my sisters Marilyn and Nancy Beckley, we are very pleased with the careful details we read about in this project.

The look of the forest as we've know it for the last 70 years will certainly change, but the regrowth of native trees will be a treat to see.

I'll probably run around taking pictures of the big spruce stands before they go.

We're glad some repair is going to be done to Franklin Lane Truck Trail. It would be especially helpful to restore the culvert under the north end of Franklin Lane where it meets State Farm/Forestry Rd. I'm sure the original 1935 stone culvert is still there, buried in pine needles and sand from State Farm Rd.

If you are interested, we could put together a little of the history of the Henry and Gertrude French's purchase of the Babbitt place in 1912, and the subsequent sale soon thereafter of 200 acres in Colrain and Heath to the Forestry. The Frenchs hosted a "road-warming" party for the CCC boys and all the neighbors on the hill, soon after the road was finished in their back field.

It included a softball game, cookout, the piano from the CCC camp, and paper Japanese lanterns in the trees. The old folks on the hill remembered it well when we were kids. We have a few snapshots of the party and of the woods from our back field when the trees were less than 6 feet high.

Our mother, Ruth Beckley, a neighbor of the French's, first came to visit them in Colrain in 1920. She and my father were often there through the 1920s and 1930s, including at the CCC party.

Gertrude French sold our place to my parents in 1947.

There used to be traces of a wagon road starting in our back field, running sort of NE, through a gap in the wall near our NE corner and across to the big Barn foundation near the corner of Ed. Clark Rd. and the State Farm/Forestry Rd.. We're going to explore this spring and see if we can find it anymore.

Ruth Beckley McDowell

229 Thompson Rd. Colrain

413-624-5503

April 8<sup>th</sup>, 2016

Kristopher Massini  
740 South Street  
PO Box 1433  
Pittsfield, MA 01202

Re: Heaphy Richardson Lot comments

Dear Kristopher,

Thank you for inviting the Appalachian Trail Conservancy (ATC) to comment on the proposed timber harvest on the Heaphy Richardson lot in the Central Berkshire District - 02, part of October Mountain State Forest, in Becket, Massachusetts. We have reviewed the documentation and met on-site on March 25<sup>th</sup>, 2016 to discuss the specifics of the project with Kristopher Massini and William Hill of MA DCR Forestry division, along with our management partners from the Appalachian Mountain Club. Our comments on the proposal follow the background info on ATC and the Appalachian Trail.

**Organizational background**—The Appalachian Trail Conservancy (ATC) is a private, nonprofit, conservation organization founded in 1925 (as the Appalachian Trail Conference) to coordinate private-citizen - as well as public-agency - efforts to design, construct, and maintain the Appalachian Trail and to conserve and manage adjacent lands and resources. ATC has a membership of 43,000 individuals and also is a federation of 31 affiliated hiking and outing clubs throughout the eastern United States, each of which maintains an assigned segment of the Appalachian Trail. From its earliest beginnings, the Appalachian Trail and its associated facilities have been maintained largely by a corps of dedicated volunteers that today numbers more than 6,000 individuals and annually contribute over 240,000 hours to Trail maintenance, protection, and education.

**Mission**—The Appalachian Trail Conservancy's mission is to preserve and manage the Appalachian Trail—ensuring that its vast natural beauty and priceless cultural heritage can be shared and enjoyed today, tomorrow, and for centuries to come.

**Appalachian Trail overview**—The Appalachian Trail (A.T.) is a 2,189-mile footpath extending from Maine to Georgia through 14 states, generally along the ridgelines and major valleys of the Appalachian Mountain range. The A.T., as it is generally known, connects six National Parks, eight National Forests, and more than 60 state parks, forests, and game-management units. The Trail received Federal recognition in 1968 under the National Trails System Act as the nation's first National Scenic Trail. Congress mandated through that act that the Appalachian National Scenic Trail (ANST) would be administered by the Secretary of Interior in consultation with the Secretary of Agriculture. As an outgrowth of amendments to the act in 1978, and notwithstanding its checkerboard pattern of land ownership and administration, the Trail is now identified as a unit of the National Park System and is administered by the A.T. Park Office and the Appalachian Trail Conservancy in separate offices in Harpers Ferry, West Virginia. ATC has formal agreements with

the National Park Service, the U.S. Forest Service, and numerous state agencies in the management of the A.T. Over two million annual visitors hike or backpack on the A.T.

**The A.T. in October Mountain State Forest** – Approximately 7.5 miles of the Appalachian Trail pass through October Mountain State Forest between Route 20 and just north of West Branch Road. The section of A.T. footpath affected by the proposed timber harvest on the Heaphy Richardson lot runs from Tyne Road to approximately ½ mile south.

**Comments on Heaphy Richardson timber harvest** - The A.T. in Massachusetts is subject to a signed Memorandum of Understanding (MOU) between all relevant public and private partners and landowning agencies that clarifies responsibilities as well as restrictions related to management of the Trail. Specifically, the MOU establishes an “Appalachian Trail Corridor” on publicly owned lands surrounding the A.T. footpath to preserve and enhance the Trail experience across all such lands. This corridor will be at least 1,000 feet wide and made up of a “Primary Zone” of 400 feet and a “Secondary Zone” of at least 600 feet to incorporate outstanding natural or other resources in the “Appalachian Trail Corridor”.

The related sections of this document that pertain to the Appalachian Trail for the proposed harvest on the Heaphy Richardson lot are as follows:

- Within the “Primary Zone” on state lands, the Appalachian Trail will be the “Primary Feature” for which lands are managed (4.2.1).
- Forest Management practices shall be limited to those practices that are directly beneficial to the Trail, as determined by the local planning process and agreed upon on the *Massachusetts Appalachian Trail Management Plan* (4.2.2).
- The use, protection, and enhancement of the Trail will take precedence over all other management priorities (4.2.3).
- Within the “Secondary Zone”, all parties shall identify, discuss, and coordinate, on a case-by-case basis, proposed uses within the Zone...” (4.3.2).

ATC understands that responsible timber harvesting is a key component in the management portfolio for DCR Woodlands. It is our intention to provide recommendations to MA DCR, within the confines of the MOU, to ensure that any harvest that takes place near the Appalachian Trail does not diminish A.T. values or the hiking experience of our visitors.

For proposed harvesting in the Primary Zone, ATC requests that:

- No timber harvesting occurs in the Primary Zone.

For proposed harvesting in the Secondary Zone, ATC requests that:

- Impact to the Secondary Zone is minimized.

- Crossing of the A.T. footpath is limited to one perpendicular crossing for purposes of a skid road.
- The skid road will be brushed in when the harvest is complete.
- The harvest takes place only in the winter months when the ground is frozen and A.T. visitation is likely to be lower.
- The log landing at Tyne Road be blocked off to any motorized access and brushed in when the harvest is completed.
- Appropriate signage is placed on the A.T. on both sides of the proposed harvest area to inform visitors of the management being undertaken and provide safety guidelines for entering and passing through the area while operations are underway.
- All signs and flagging be removed upon completion of the project.

Thank you once again for the opportunity to comment on the proposed Heaphy Richardson Lot forest management project in October Mountain State Forest. ATC greatly values its partnership with MA DCR and we look forward to continuing to work collaboratively in managing our public lands for the enjoyment of all citizens of the Commonwealth.

Sincerely,



Adam Brown  
Conservation Stewardship Manager  
Appalachian Trail Conservancy  
Kellogg Conservation Center  
PO Box 264  
South Egremont, MA 01258  
Office: 413.528.8002

[abrown@appalachiantrail.org](mailto:abrown@appalachiantrail.org)  
[www.appalachiantrail.org](http://www.appalachiantrail.org)

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The following are my comments about the Forest Management Project being proposed at:

Name of Forest Management Project: \_

Wendell State Forest, Montague Road Brook Road State Forest:

Management Forester:

Keith DiNardo

Forest Health:

The forest management proposed is a well planned much needed management project. The stand in question has supported management activities at least twice in the past and is well stocked with Eastern White Pine regeneration and associated tree species. White pine regeneration requires a partial shade provided by the overstory for the first five-ten years. Once this regeneration reaches approximately knee height it needs to be released from the overstory shading and allowed to be free to grow. If this release does not occur the regeneration becomes spindly, suppressed and dies. The Red Pine overstory is of good quality and has merchantable value. The Red Pine however is slowly dying like all Red Pine across the Commonwealth and to salvage some of that Red Pine now makes good sense. Some might argue to allow the White Pine release to occur naturally as the Red Pine dies however that suggestion ignores the fact that as the Red Pine dies it will break up and fall crushing and damaging the well formed healthy White Pine understory below. By employing directional felling in harvesting the Red Pine, damage to the White Pine understory can be controlled and minimized resulting in a healthy residual forest understory that is free to grow.

Recreation:

Light dispersed recreational use of the harvesting will be temporarily interrupted for obvious safety reasons. If it wasn't for past harvesting the present trails used by equestrians, hikers, skiers and snowmobilers to name a few, would not be there as these trails are direct benefits of past management activities. I am sure that at the completion of harvest the trails and landings will be final graded and returned to their preharvest condition.

#### WATER QUALITY:

Any water quality issues are addressed in all timber sales on public or private lands by the provisions of Chapter 132.

AESTHETICS: The aesthetics of any logging activity temporarily impact a harvesting area. Course woody debris, broken limbs on the ground and brown dying foliage are unavoidable. This course woody debris however is important in recycling nutrient to the soil as well as providing habitat for small mammals and invertebrates. Within one to two growing seasons the aesthetics of the area quickly returns as a healthy vigorous forest habitat responds to management.

FOREST MANAGEMENT : DCR forest management activities provide multiple benefits to the residents of the Commonwealth. Management projects provide income to the Commonwealth, modest income to the communities where the activities occur, employment for those in the wood producing industry as well as secondary industries; they help maintain our forest in a vigorous healthy state and help repair the damage when natural disasters occur. Wildlife greatly benefits from habitat manipulation caused by management activities based on the management objective. Finally the public benefits from management activity through the creation and maintenance of trails and roadways in our state forest where the management activity occurs. Forest management in our state forest is a “win win” for all. It is good to see the return of management activities following the ill advised Forest Visioning Process.

Submitted by:

David Richard

Wendell, MA 01379



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April 9, 2016

Kristopher Massini  
Massachusetts Department of Conservation & Recreation  
740 South Street  
PO Box 1433  
Pittsfield, MA 01202

**Re: Heaphy-Richardson Lot Forest Management Proposal**

Dear Mr. Massini:

Thank you for the opportunity to comment on the proposed forest management project at October Mountain State Forest's Heaphy Richardson Lot. The Appalachian Mountain Club's (AMC's) Berkshire Chapter maintains the Appalachian Trail (A.T.) in Massachusetts, including the section that traverses the proposed project area, in cooperation with the Department of Conservation and Recreation (DCR), the National Park Service, the Appalachian Trail Conservancy, and other relevant Massachusetts agencies as described in our Memorandum of Understanding for the A.T. in Massachusetts (MOU). AMC appreciates your early outreach and the opportunity to review the project in the field on March 25 in the spirit of cooperative management.

Overall, AMC agrees that the proposed silvicultural prescription is appropriate for the primary forest management goals described in the project notice. These comments therefore focus on the proposed project relative to the Appalachian Trail and the values for which it is managed.

Through the MOU for the A.T. in Massachusetts, an "Appalachian Trail Corridor" has been established on public lands surrounding the A.T. "to preserve and enhance the trail experience across all trail lands." On State-owned lands, the corridor consists of a Primary Zone that extends 200 feet on each side of the Trail, and a Secondary Zone extending an additional 300 feet on each side of the Trail. As stated in section 4.2, within the Primary Zone on state lands:

- the Appalachian Trail will be the primary feature for which the lands are managed
- forest management practices shall be limited to those directly beneficial to the trail
- should forest management activities take place on adjoining lands (as is proposed at the Heaphy-Richardson Lot) logging trails will avoid crossing the Trail wherever possible
- the use protection, and enhancement of the trail will take precedence over all other management priorities



For forest management projects within the Secondary Zone, the MOU states:

*“Before any timber harvesting within the Secondary Zone occurs, MA-DEM (now DCR) will notify the Massachusetts Appalachian Trail Management Committee (of the AMC Berkshire Chapter)...to allow them an opportunity to review and comment. However, the approval of the Massachusetts Appalachian Trail Management Committee is not required for any timber harvesting in the Secondary Zone.”*

The “Landscape Designations for DCR Parks & Forests” Management Guidelines provide further guidance for skid trail crossings of the Appalachian Trail in Appendix 2 under “Recreation and Forestry,” p. 68:

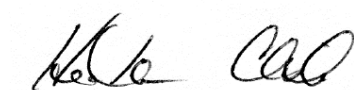
*“Should forest management take place within the primary or secondary corridors, skid trails should not cross the AT unless there are no feasible alternatives. If skid trails must cross the trail, they should cross perpendicular to the trail.”*

Accordingly, and based on observations during our site visit of March 25, AMC requests that:

- No timber harvesting occur in the Primary Zone –natural processes should dominate in the primary zone for the relatively unique recreational and aesthetic experience the Appalachian Trail provides in this region.
- Any skid road crossing occurs perpendicular to the trail; AMC agrees that the surrounding topography within the boundaries of October Mountain State Forest makes it unfeasible to avoid a crossing in this case
- The skid road is brushed in when the harvest is complete
- Aesthetic impact to the secondary zone is minimized
- The harvest occurs only in the winter months when the ground is frozen and A.T. visitation is likely to be lower.
- The log landing at Tyne Road is blocked off and brushed in to inhibit motorized access when the harvest is completed.
- Appropriate signage is placed on the A.T. on both sides of the proposed harvest area to inform visitors of the management being undertaken and provide safety guidelines for entering and passing through the area while operations are underway.
- All signs and flagging be removed upon completion of the project.

Thank you once again for the ongoing cooperation in managing the Appalachian Trail and the opportunity to comment on this project in particular.

Sincerely,

A handwritten signature in black ink, appearing to read 'Heather Clish', is written over a light gray rectangular background.

Heather Clish  
Director of Conservation & Recreation Policy

I attended the recent DCR hearing at UMass on the proposed Wendell State Forest - Brook Road Forest Management Plan and was deeply concerned about the total lack of attention to carbon sequestration within the listed "Forest Management Objectives". Our Massachusetts Global Warming Solutions Act calls for "a framework for reducing heat-trapping emissions to levels that scientists believe give us a decent chance of avoiding the worst effects of global warming".

CO2 sequestration by our forests, lands and waters must be addressed if we are to preserve our state in a livable manner for future generations. We can not plan for forest management without addressing carbon sequestration.

Don Ogden

Leverett, MA

My family owns and manages a woodlot abutting H.O. Cook State Forest and we welcome the return of logging activities here. After all, these plantations were established with the intention of being harvested for timber in the first place. This forest covers a vast area and relatively few of the logging roads from past cuts appear to have been either retained or maintained.

Those who engage in any of the recreational activities referenced in this proposal would benefit greatly from the improved forest access provided by the new forwarder roads created by this project. The DCR can also use this new access to showcase examples of the BMPs that they are using to manage public lands. Though not specifically mentioned, this improved mobility will also have a positive impact on public safety in the unfortunate event of forest fire, medical emergencies or individuals lost in the woods.

A small section of what you call "Forestry Road" will be improved in order to facilitate this project. The rest is an abandoned carriage road that once connected State Farm Road with Adamsville Road. Much of this trail runs within the boundaries of the state forest. Access to 2 old mills, a bridge abutment and the magnificent gorge created by the Sanders Brook (and it's remote trout pools) is limited by it's current condition. We hope that in the near future some of the revenue from this project will be used to restore this road in order to improve public access to the most remote and arguably the most scenic portions of H.O. Cook State Forest.

We look forward to attending the pre-harvest tour.

Robert J. Saquet

April 10, 2016

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

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

**RE: Comments on Eight Proposed Forest Management Projects**

Dear Ms. Rowcroft,

We are writing to comment on eight 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 Brook Road (Wendell State Forest), Brookline Road (Townsend State Forest), Clam River Dam (Sandisfield State Forest), Heaphy-Richardson Lot (October Mountain State Forest), Sheep Ranch Rendezvous (H.O. Cook State Forest), Stonewall Lot (Oakham State Forest), Tannery Road (Savoy State Forest), and Townsend Home Fuel Wood (Townsend State Forest). The following comments apply to all of these projects.

We have a number of questions and concerns regarding the proposed projects. It is particularly important that analysis of these projects provide documentation that DCR has fully considered their potential impacts on climate change and on the Commonwealth of Massachusetts budget.

**Climate Change and Forest Carbon Sequestration**

Halting and reversing the increase of atmospheric carbon dioxide (CO<sub>2</sub>) and other greenhouse gases (GHG) to address climate change is an unprecedented challenge. The Paris Agreement on climate change,<sup>2</sup> endorsed by the U.S. and almost 200 other countries, affirmed that it is critical to limit global temperature rise to well below a rise of 2 degrees Celsius beyond pre-industrial levels. Article 5 of the Agreement declares that to achieve this goal, "Parties should take action to conserve and enhance, as appropriate, sinks and reservoirs of greenhouse gasses...including forests."

The importance of forest protection in mitigating climate disruption is increasingly recognized by the scientific community. For example, Woods Hole Research Center has noted that "even complete cessation of fossil fuel use by 2100 might not be enough to limit global warming to 2 degrees Celsius," but that the proper management of tropical and temperate forests could "accumulate additional carbon, bringing the total accumulation to as much as 5 billion tons of carbon per year."<sup>3</sup>

Recent research provides scientific evidence that the impacts of continued global warming may well be even worse and occur even sooner than previously thought. For example, a paper

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<sup>1</sup> Department of Conservation and Recreation. 2016. DCR Announces Public Meetings for Forest Management Projects in H.O. Cook, October Mountain, Sandisfield, Savoy, Wendell, Oakham and Townsend State Forests. Commonwealth of Massachusetts

<http://www.mass.gov/eea/docs/dcr/news/public-meetings/materials/forestry/march2016-forestry.pdf>  
<sup>2</sup> United Nations Framework Convention on Climate Change (UNFCCC). 2015. "Adoption of the Paris Agreement" <http://unfccc.int/resource/docs/2015/cop21/eng/l09.pdf>

<sup>3</sup> Richard A. Houghton and Alessandro Baccini. 2015. Forest Restoration: The Bridge to a Fossil- Fuel-Free Future. Woods Hole Research Center Policy Brief. May 2015 [http://whrc.org/wp-content/uploads/2015/06/PB\\_Restoration.pdf](http://whrc.org/wp-content/uploads/2015/06/PB_Restoration.pdf)

published by 19 leading climate experts concludes that, “we have a global emergency” because human-caused increases in atmospheric concentrations of carbon dioxide likely will melt ice sheets far more rapidly than previously anticipated. The melting would, within the near future, raise sea levels by several meters, arrest the North Atlantic Ocean circulation, and stimulate super storms.<sup>4</sup> This research demonstrates the need to take immediate action to reduce atmospheric CO<sub>2</sub> and other greenhouse gasses (GHG).

Massachusetts has the potential to play a key role in U.S. efforts to address the climate crisis. Our state’s forests are high in biomass density and carbon storage capacity.<sup>5</sup> About 13 percent of the land base is in state ownership. This offers our Commonwealth an outstanding opportunity to provide leadership in the protection and restoration of forests to help mitigate climate change.

The DCR took a positive step several years ago with the Forest Futures Visioning Process (FFVP). The FFVP was meant to take a fresh look at the agency’s forestry program and to help chart a new course for the management of state-owned forest lands.

DCR, with facilitation by the Massachusetts Office of Public Collaboration (MOPC), launched the FFVP in April 2009. The agency undertook this process at the suggestion of the DCR Stewardship Council, in response to public criticisms of some of DCR’s forestry practices and in recognition of the need to engage the public in an active dialogue about land management within the DCR State and Urban Parks system. Led by a Technical Steering Committee (TSC) composed of individuals with a high level of expertise on issues, trends, and best practices in climate change, forest conservation and ecology, invasive species, landscape ecology, natural resource economics and law, recreation, silviculture, social policy, visual/aesthetics, watersheds, and wildlife habitat, and guided by an Advisory Group of Stakeholders, the FFVP involved five public forums that were attended by over 500 individuals and received over 1,000 comments during the course of the process.

In its final recommendations report, the TSC encouraged DCR to embrace a “land management paradigm shift ... moving the Department’s forest management towards a vision based on a more comprehensive suite of ecosystem services.”...The TSC focused on the premise that DCR lands should be managed for the provision of ecosystem services to the public that are not consistently delivered by private lands. These services include: carbon sequestration....<sup>6</sup>

The 2008 Massachusetts Global Warming Solutions Act (GWSA) includes specific targets for reducing emissions of carbon dioxide and other greenhouse gases (GHG).<sup>7</sup> The GWSA calls for

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<sup>4</sup> J. Hansen, M. Sato, P. Hearty, R. Ruedy, M. Kelley, V. Masson-Delmotte, G. Russell, G. Tselioudis, J. Cao, E. Rignot, I. Velicogna, B. Tormey, B. Donovan, E. Kandiano, K. von Schuckmann, P. Kharecha, A. N. Legrande, M. Bauer, and K-W Lo. 2016. Ice Melt, Sea Level Rise and Superstorms: Evidence from Paleoclimate Data, Climate Modeling, and Modern Observations that 2 °C Global Warming Could Be Dangerous, *Atmos. Chem. Phys.*, 16, 3761-3812, doi:10.5194/acp-16-3761-2016 <http://www.atmos-chem-phys.net/16/3761/2016/acp-16-3761-2016.html>

<sup>5</sup> Daolan Zheng, Linda S. Heath, Mark J. Ducey, and Brett Butler. 2009. Relationships Between Major Ownerships, Forest Aboveground Biomass Distributions, and Landscape Dynamics in the New England Region of USA. *Environmental Management* Volume 45, Issue 2 , pp 377-386 <http://link.springer.com/article/10.1007%2Fs00267-009-9408-3>

<sup>6</sup> Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines (p. 1-2) <http://www.mass.gov/eea/docs/dcr/ld/management-guidelines.pdf>

<sup>7</sup> Commonwealth of Massachusetts. Acts of 2008 Chapter 298. An Act Establishing the Global Warming Solutions Act. <https://malegislature.gov/Laws/SessionLaws/Acts/2008/Chapter298>



the Massachusetts Department of Environmental Protection (DEP) to publish a state GHG emissions inventory, including both emission sources and carbon sinks. Moreover, the GWSA establishes statewide goals that will achieve a reduction of between 10% and 25% below statewide 1990 GHG emissions by 2020 and 80% below 1990 GHG emissions by 2050.

To date, Massachusetts policy makers and agency officials have not risen to these challenges. Although there is a broad global consensus that managing forests to maximize carbon sequestration is vital to mitigating disastrous climate disruption, state agencies have failed to take decisive action to address this issue. Instead of providing strong regulation of GHG emissions from forests, DEP has allowed DCR to continue a forest management program with no apparent requirement that it conduct an on-the-ground baseline carbon inventory, or that it ensure that its programs are helping to achieve GWSA GHG reduction goals. Despite the recommendations of the FFVP Technical Steering Committee and Advisory Group of Stakeholders, DCR has not made a “land paradigm shift.”

Instead, as indicated by the eight forest management projects currently proposed by DCR, the agency has fallen back into business as usual, cutting our state forests with no apparent regard or accountability for carbon sequestration or climate impacts. These projects provide considerable detail in describing available “stands” of timber, why they should be cut, and how the agency plans to cut them. However, none of them include any mention whatsoever of climate change or documentation of the net carbon impacts of the project. Only one of the projects, Brookline Road in Townsend State Forest, even mentions the word “carbon.” Unfortunately, this is in the context of undocumented claims that logging will provide “short term carbon sequestration” and will “build [forest] complexity” that will “sequester carbon.”<sup>8</sup>

The Regional Greenhouse Gas Initiative (RGGI), established by the Commonwealth of Massachusetts and eight other states, offers guidance that could be followed by DCR to assess how its forest management projects affect forest carbon. RGGI provides a number of useful requirements and methods for quantifying the net climate benefits of such projects.<sup>9</sup>

- Standing live carbon (carbon in all portions of living trees)
- Shrubs and herbaceous understory carbon
- Standing dead carbon (carbon in all portions of dead, standing trees)
- Lying dead wood carbon
- Litter and duff carbon (carbon in dead plant material)
- Soil carbon
- Carbon in in-use forest products
- Forest product carbon in landfills
- Biological emissions from site preparation activities
- Mobile combustion emissions from site preparation activities
- Stationary combustion emissions from ongoing project operation and maintenance
- Biological emissions from clearing of forestland outside the project area
- Biological emissions/removals from changes in harvesting on forestland outside the project area

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<sup>8</sup> Massachusetts Department of Conservation and Recreation. 2016. Forest Management Proposal: Brookline Road <http://www.mass.gov/eea/docs/dcr/stewardship/forestry/manage/forest-product/brookline-road.pdf>

<sup>9</sup> Regional Greenhouse Gas Initiative. 2013. Offset Protocol U.S. Forest Projects [http://www.rggi.org/docs/ProgramReview/\\_FinalProgramReviewMaterials/Forest\\_Protocol\\_FINAL.pdf](http://www.rggi.org/docs/ProgramReview/_FinalProgramReviewMaterials/Forest_Protocol_FINAL.pdf)

- Combustion emissions from production, transportation, and disposal of forest products
- Biological emissions from decomposition of forest products

To date, RGGI guidelines have assumed that burning forest biomass for energy is “carbon neutral.” Recent science, such as the 2010 Manomet study, commissioned by the Commonwealth of Massachusetts<sup>10</sup>, has found that this is not the case. In fact, the Manomet study concluded that whole tree biomass burned as fuel results in greater net emissions of carbon dioxide than from fossil fuels. Consequently, prudent measurement of the carbon impacts of forest management activities should also include:

- Biological emissions from burning of forest biomass as waste or for energy

DCR has a duty, consistent with the Paris Agreement, the GWSA, and the recommendations of the FFVP, to begin fully and seriously addressing the carbon and climate impacts of forest management. Toward that end, we request that, before DCR starts any on-the-ground activities for the eight forest management projects being considered, the agency:

- describe how DCR plans to measure each of the RGGI factors listed above — as well as emissions from burning of forest biomass — before the project is begun, and how it will provide follow-up measurements after the project is completed;
- supply numerical data for each of these factors;
- explain how each project conforms with the mandate of the GWSA to collaborate with the DEP to monitor and regulate emissions of GHGs with the goal of reducing those emissions;
- provide estimates of the expected net carbon emission and sequestration impacts of these projects by 2020 and 2050;
- if the proposed project does not maximize the amount of stored forest carbon, fully and transparently explain why DCR has concluded that the benefits from not doing so outweigh the costs; and
- offer an opportunity for public review and comment on these findings.

The days are past when forest management projects could be planned and executed by DCR with no regard for the global climate. We now know that forest management decisions made today will have climate implications for many decades to come. DCR has the chance to leave a priceless legacy to future generations by protecting our precious state forests and their vital capability to mitigate climate disruption.

### **Costs versus Benefits of Proposed Projects**

In January 2016, Governor Charlie Baker announced that, due to a projected shortfall, he is cutting the Massachusetts state budget mid-fiscal year by \$49 million. This includes freezing

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<sup>10</sup> Manomet Center for Conservation Sciences. 2010. Massachusetts Biomass Sustainability and Carbon Policy Study: Report to the Commonwealth of Massachusetts Department of Energy Resources. Thomas Walker (Ed.). Contributors: Peter Cardellicchio, Andrea Colnes, John Gunn, Brian Kittler, Robert Perschel, Christopher Recchia, C., David Saah, and Thomas Walker. Natural Capital Initiative Report NCI-2010- 03. Brunswick, Maine <http://www.mass.gov/eea/docs/doer/renewables/biomass/manomet-biomass-report-full-lorenz.pdf>

hiring for a number of state jobs, reducing grants to hospitals and community health centers, and canceling planned clean water programs.<sup>11</sup>

In light of current budget realities, it is more critical than ever for our state government funds to be spent in a fiscally sound and sustainable manner. This includes DCR's forest management program.

For each of the eight planned forest management projects noted above, we request that DCR provide dollar figures for each of the line items listed below.

Projected costs:

- Forester salaries and benefits
- Contract and/or seasonal forester salaries
- Vehicle operation and maintenance
- Supplies and equipment
- Related Bureau of Forestry office operating costs
- Boundary surveying
- Road building and maintenance
- Mitigation of invasive species, water quality degradation, soil erosion, etc.

Projected revenue:

- Revenue from sale of trees cut
- Other sources of revenue
- Projected net costs versus revenue over life of project

If the costs of an individual project are projected to exceed revenues for the sale of trees cut, we request that DCR explain how the net benefits to the public justify such a loss to taxpayers. Such an analysis must include other public programs and services forgone in order to implement the forest management project. If it is claimed that there are broader economic benefits to society, such as increased carbon storage to mitigate climate change, then these benefits need to be specifically documented.

Thank you in advance for the opportunity to comment on these eight forest management projects. We stress that it is important that the information requested be fully documented and publicly available for review before any decisions are made regarding the implementation of these projects. Therefore, we look forward to your timely response.

Sincerely,

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<sup>11</sup> David Scharfenberg. 2016. Governor Charlie Baker Shaves \$49m Off Budget. The Boston Globe <https://www.bostonglobe.com/metro/2016/01/08/baker-cuts-million-from-state-budget/acEhrS3RKBzThD1T7pkwBJ/story.html>



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To: Timber Comments and Peter Church Director of Forest Stewardship

Dear Mr. Church,

I am addressing my comments regarding the Current Project Proposals and Silva Culture Prescriptions to include you because, as the Director of Forest Stewardship, you have a responsibility to uphold the priorities established through the Forest Futures Visioning Process (FFVP) in which a great many stakeholders played a part. Foremost among the FFVP priorities and the creation of your position, was the promise that the Commonwealth would provide "open and transparent government" in the managing of state forests, particularly in those forested lands open to logging.

While I am not concerned about plantation removals, DCR is proposing the harvesting of an untold number 100+-year-old hardwood trees within the hundreds of acres of forested lands cited in these eight proposals with no estimation of the quantity or value of the timber or who stands to benefit from the sale of the timber. The proposals provide some information on the amounts and condition of the less valuable and diseased trees but do not provide adequate information on the numbers or the monetary value of the commercially valuable hardwoods targeted by these projects.

The proposals I have reviewed are vague and misleading with the important information buried within the proposals. DCR needs to provide "open and transparent" verifiable data as to the type, numbers and value of the timber as a producer of revenue from the state forests, as one would expect from a responsible steward of the Commonwealth's natural resources.

I am dismayed to see that the DCR contracted Sewall, an engineering and natural resource consultant company, to evaluate the Clam River Dam project before the NHESP had the opportunity of determining Priority Habitat of Rare Species and Estimated Habitat of Rare Wildlife.

May I remind you that only those species documented as existing are counted as occupying a land parcel and that habitat types may contain state-listed species that have yet to be documented. It is irresponsible, in a time when many scientists believe that the planet is facing a mass extinction and collapse of natural systems, to propose logging on land that has not been fully evaluated by the state departments established to protect threatened plants and animals.

As in the letter submitted by Michael Kellett and Ellen Moyer, which I signed, I would like to reiterate the importance of the DCR in providing data regarding the climate impacts of each forest timber harvesting proposal on carbon sequestration and long-term CO<sub>2</sub> levels. Each woodland must receive the most careful and thorough review for its potential in climate change mitigation above any other proposed "treatment" for any other benefit is considered. The second highest value must be in habitat protection for state-listed species.

We have entered an era where the highest priorities for every parcel of state-owned natural land must be in reducing carbon in the atmosphere for climate change mitigation and preventing the loss of plant and animal species as we enter what many scientists believe is the next planetary mass extinction. Anything less is irresponsible and misguided.

While I support the proposals that involve the removal of plantations, I am asking for a withdrawal of every proposal in which hardwood harvesting is included. As the Director of Forest Stewardship, it is your responsibility to assure that DCR considers the highest and best use of our public forests and justify with data any and every proposal in the ways I have indicated above.

I have reviewed and extracted information from the following four of eight project proposals and would like my comments applied to these proposals as well as entered into the general comments:

Sheep Ranch, H.O. Cook State Forest- Removal of plantations and 25 acres of white pine-hardwood.

Tannery Road, Savoy - No removal of American beech over 14" diameter and no white ash 12" - 16" to be removed. Permitted to remove 82+ acres Northern Hardwoods: American beech under 14", red maple, sugar maple, yellow birch, white ash under 12", white birch.

Heaphy-Richardson Lot, October Mountain State Forest

230 acres of northern hardwood forest types: white ash (*Fraxinus Americana*), sugar maple (*Acer saccharum*), red maple (*Acer rubrum*), American beech (*Fagus grandifolia*), black cherry (*Prunus serotina*), quaking aspen (*Populus tremuloides*), yellow birch (*Betula alleghaniensis*), red oak (*Quercus rubra*), white birch (*Betula papyrifera*), and Eastern hemlock (*Tsuga canadensis*). The stand age is approximately 90-110 years old.

The irregular shelterwood area will remove an average of 30- 80% of the basal area based on conditions such as species composition, size and health of trees.

Clam River Dam, Sandisfield State Forest

130 acre are hardwood and mixed hardwood types with BB (beech birch maple) and HH (hemlock hardwood) covering the proposed treatment area according to the Sewall stand inventory data.

Beech, (*Fagus grandifolia*), white ash (*Fraxinus Americana*), black cherry (*Prunus serotina*), sugar maple (*Acer saccharum*) and red oak (*Quercus rubra*) Other species present include black birch (*Betula lenta*), yellow birch (*Betula alleghaniensis*), and red maple (*Acer rubrum*) with some eastern hemlock (*Tsuga Canadensis*) and white pine (*Pinus strobes*).

According to the 13th addition of the Massachusetts Natural Heritage Atlas this proposed sale may contain Priority Habitat of Rare Species and Estimated Habitat of Rare Wildlife. The Clam River above the impoundment contains this habitat. We will need clarification from NHESP.

The proposed harvest will not significantly adversely affect habitat for most species. Early succession habitat will be slightly increased with the implementation of 1/3 acre openings but not enough to significantly increase this type of habitat. To an increasing extent private and non-profit property owners within the surrounding landscape are taking advantage of state and federal programs to increase this habitat.

The primary goal is to implement a harvest system that creates a varied and complex stand capable of buffering future disturbance, providing a variety of wildlife habitats, and maintaining the current species, size and genetic diversity and the demonstration of a system which can obtain these goals.

Secondary goals include supporting local wood products industry, salvaging the value of damaged and diseased trees, providing income to the town and to the general fund. Another goal is the establishment of ash regeneration, by retaining most small diameter ash trees, which might survive the expected borer infestation and provide seeds for a future population.

Thank you for the opportunity to submit comments and I will be most appreciative of your response.

Timber Comments Contact: Please let me know that you have received my comments. Thank you.

Sincerely,

Sharl Heller

Forest and Park Friends Network

Southeastern Massachusetts Pine Barrens Alliance