

GENERAL FORESTRY COMMENTS AND RESPONSES – Winter Proposals 2017

Individual or Organization	Public Comment Summary	BOF Response
Ken and Lana Hall	<p><u>Peru State Forest – Garnet Hill Lot</u></p> <p>Pleased that forest management will be taking place and that the activity will bring about improvements to the property such as the wildlife habitat, road maintenance, and gates to prevent illegal ATV use and resultant damage.</p>	<p>The DCR Bureau of Forestry (DCR – BOF) appreciates the support and also believes strongly that responsible, sustainable forest management practices can provide multiple benefits to the property as well as provide forest products to society as a whole – one of the missions of DCR Woodlands</p>
<p>David Galt, The Friends of Peru State Forest</p> <p>Group Comments received from: Michael Kellett, Eric Chivian, Janet Sinclair, Chris Matera, Ellen Moyer, Ellen Moyer, Glen Ayers, Claudia Hurley, Ray Weber, Lucy Gionfrido, Elizabeth Adams, Meg Shehan, Don Ogden, Elizabeth Ahearn, Dorothy McIver, Michealann Bewsee, Lynn Ballard, Dave Gafney, Hazel Dawkins, Carissa Sinclair, Alison Bowen, Suzanne R. Carlson, Patrick Devlin, Louise Graboski, Catherine</p>	<ol style="list-style-type: none"> 1. Believes that Peru State Forest has not been significantly harvested in decades and that an old growth approach or reserve status is more desirable for Peru SF. 2. Concerned the project does not consider carbon sequestration changes and climate change impacts and that the project activity will have significant negative effects on these processes. 3. Believes that this project will “fragment” the forest and does not believe that there is a need for expanding early successional forest acreage and believes that it is common in Massachusetts. 4. Believe that it is inappropriate to harvest and salvage dying red pine plantation to try and control disease or to salvage commercial value. 5. Beech is characterized as being “undesirable” is a commercial not an ecological classification. Disagrees that 	<ol style="list-style-type: none"> 1. There have been 12 timber sales at Peru State Forest since 1981 from which an estimated 1,488,039 board feet of timber was harvested from nearly 500 acres of the forest. Additionally, 1,673 cords of firewood and 537 tons of pulpwood were cut from the same timber sales. Although the area in the Garnet Hill Proposal has not been harvested recently, Peru State Forest has a long history of forest management. The Forest Futures Visioning Process and resulting Landscape Designations designated Peru as Woodland in part because of its long history of forest management. Every property that is a part of the DCR property system was scientifically evaluated for its value as a Reserve, Park or Woodland designation as documented on pages 5 and 6 and Appendix 9 of the Landscape Designations for DCR Parks & Forests: selection Criteria and Management Guidelines. DCR – BOF believes that the Woodland designation of Peru State Forest is appropriate based on the evaluation and was well vetted in the public process.

<p>T. Driscoll, Steve Ryack, Merideth Bernhardt, Mary Gilbert, Audrey Ortega, James Schilling-Cachat, Rolf Cachat – Schilling, Lisa Turowsky, Lee Anne and Stuart Warner, Miles V. Tardie, Ralph S. Baker, Sandy Kosterman, Ellen Hopman, Tom Neilson, Richard Stafursky, Bill Keck, Susan Massino, Anna Zewinski, Green Futures, Arise for Social Justice, Todd Steglinski, Steve Kisiel, Bonny DiTomasso, Sarah Soffer, James Kenney, Barbara Kenney, Peter Liberman, Sam Liberman, Greg Moynahan, Danielle Riou, Katie Galt</p>	<p>diseased and undiseased beech should be cut or that using chemicals should be used to suppress beech. Beech stands should develop naturally – resistant beech will be a part of a diverse forest.</p> <p>6. Are of the understanding that the proposed openings in the northern hardwood stands are larger than allowed on state lands. Believe that the proposal for the northern hardwood stands is a logging plan and strongly object to level of harvesting as proposed.</p> <p>7. Believes that road side buffer strips are a deception designed to hide logging.</p> <p>8. Concerned about the documentation and protection of streams, wetland resources, and rare and endangered species.</p>	<p>2. DCR – BOF believes with much of the scientific community that balanced forest management that includes harvesting forest products and the maintenance of reserves and large trees on the landscape is an appropriate approach to carbon stock management. Responsible and sustainable forest management conducted by large landowners such as DCR is carried out on a landscape scale providing a variety of ecosystem services across that landscape. Therefore, the impacts of relatively small projects such as the Garnett Hill Lot in Peru State Forest are considered against the entire portfolio of DCR and landholdings and the management approach taken there. See discussion in DCR response to comments Winter Spring 2016 .</p> <p>3. DCR – BOF does not believe that this project activity will fragment the forest habitat. Permanent development of land fragments forest habitat. The project will provide a variety of forest structures from developing young forest to uncut wetlands and mature forest.</p> <p>4. The proposed “overstory removal” of the dying red pine plantation is not designed to control the disease that is bringing about its demise. It is designed to fully release the native forest that has become established in the understory of the plantation and to salvage the commercial value of the remaining trees. This silvicultural practice is consistent and</p>
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		<p>appropriate as ecosystem services provided in designated Woodlands: “ecological restoration of degraded natural communities” and “sustainable production of renewable wood products . . .”</p> <p>5. The DCR – BOF agrees that beech is an ecologically important species. Populations of American beech that are heavily infested with “Beech Bark Disease” (BBD) will contain disease resistant individuals. In all forest management projects on DCR lands, including the Garnet Hill Project, the disease resistant beech will be left to hopefully provide a source of future disease free beech. It has been observed and well documented now for decades that the aftermath BBD in a forest stand often results in excessive beech sprouting and a preponderance of American beech seedlings and saplings that will ferociously compete with other tree species to the detriment of stand diversity and ecosystem health. The control of excessive beech sprouting is therefore to aid in ecosystem health. The use of chemicals to control excessive beech sprouting is the last choice and as note in the proposal: “. . . may be prescribed”. Research and practice have shown great promise in silvicultural methods to control excessive beech sprouts. At Garnett Hill, opening size could provide enough light to favor other species over the extremely shade tolerant American beech.</p> <p>6. The proposed opening size in the</p>
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<p>Friends of Peru State Forest</p>	<ol style="list-style-type: none"> 1. Concerned about the protection of the WW II memorial military plane crash site. 2. Believe that the proposed project will damage the forest, provide no benefit to the forest, spread invasive species and that if executed, Peru State Forest will no longer be a forest. 3. Concerned about the identification and protection of historical artifacts from the settlement period. 4. Does not believe that planned improvements to roads in the project area are necessary. 	<ol style="list-style-type: none"> 1. The DCR shares the concern for the Memorial and as the steward of this property ensures its protection. Although it is “near” the project area it will not be affected by forest management activity. Road improvements made as a part of the timber sale will improve access to the site to those who cannot currently access it. 2. The DCR respectfully submits that human induced disturbance in the ecosystem can be beneficial to the forested landscape structure and function and not “damage” the functioning ecosystem. The proposed project area was chosen to provide ecosystem services for woodlands as directed by the Landscape Designations . . . and Management Guidelines including:

		<ul style="list-style-type: none">• Create a more diverse forest structure that is resilient to disturbance• Provide the conditions for early seral or regenerating forest that will support diverse species. <p>It is widely recognized by MassWildlife and Mass Audubon that there is a dearth of young forest and shrub habitat in Massachusetts as well as across the northeast. On Massachusetts State Forest Lands alone there has been a 76% reduction in forests 0 – 40 years of age since 1960 (Massachusetts Continuous Forest Inventory). The Garnet Hill project proposes to take strides towards improving that condition with the release of native forest from the red pine plantation and through creating forest openings in the northern hardwood stands up to 5 acres which will create much needed breeding and foraging habitat for birds, mammals, and reptiles. The DCR carefully regulates and monitors harvesting operations through strict contract provisions and well trained foresters. Per contract provisions, logging equipment is cleaned and inspected by foresters before entering state land. Post-harvest monitoring for forest regeneration and invasive species is carried out by DCR foresters. The forest in Peru will always be forest. In some areas where cutting occurs, the results will be different forest structure than it is presently - there will quickly be a young vigorous forest habitat dominated by seedlings and saplings in those places.</p> <p>3. The Garnett Hill Project was reviewed by the DCR Archeologist who noted the many known historic resources in the proposed project area and subsequently provided direction for their protection. The DCR is highly committed to protecting</p>
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		<p>our cultural and historical resources. Any new discoveries of historical resources will be reviewed and cataloged by the DCR Archeologist and protected per <i>Bureau of Forestry Cultural Resource Management Protection Standards and Guidelines</i>.</p> <p>4. Drainage problems and resulting erosion on Garnet Hill Road and Spur Road within the Garnet Hill Lot project area have created an environmental problem and an access problem. At present, areas of the roads are nearing an impassable condition. The DCR does not have the operating funds to repair these roads to alleviate the erosion and provide access to those who are unable to walk. The timber sale can provide the funds to repair the roads so that there is access for everyone.</p>
<p>Appalachian Mountain Club (AMC)</p>	<p><u>Warwick State Forest – Bass Swamp</u></p> <p>Agrees that using the New England Trail (NET) as the road to forward timber and access the timber sale will have the least impact on the area but with the understanding that the trail / road will be restored or improved after the management activity is complete and that the trail be closed and rerouted around the project area during the activity. Additionally AMC recommends that</p> <ol style="list-style-type: none"> 1. A 50’ no cut buffer plus a 50’, 50% partial cut buffer be placed along the NET. 2. Recommends that only high risk trees be removed immediately adjacent to the NET 3. Harvesting activity take place after October to avoid popular 	<p>The DCR – BOF also appreciates the ongoing collaboration with AMC.</p> <p>The DCR – BOF appreciates the AMC agreement that using the road way on which the NET is located will be the least impactful to the project area and as noted in the project proposal will use timber sale proceeds to improve the road / trail condition and mitigate existing erosion issues. The DCR – BOF will assist AMC to temporarily relocate the NET route avoiding harvesting activity. The DCR – BOF believes that an aesthetic buffer is appropriate along the NET and will work to create a buffer per the AMC recommendation. The DCR – BOF agrees that the additional recommendations to remove high risk hazard trees immediately adjacent to the NET, limit harvesting scheduling and timing are appropriate for the protection of the NET</p>

	<p>hiking season. 4. Conduct harvesting on weekdays only</p> <p>Appreciates collaboration with DCR.</p>	<p>resources and DCR – BOF will work to follow and implement the recommendations.</p>
<p>Ted Cady, Clare Green, Christine Duerring, John and Mary Williamson, Mary Humpheries</p>	<p>Supports the forest management goals of the project and thorough / thoughtful proposal document, trusting that the project will be carried out as proposed.</p> <p>Concerned that the M and M trail and the aesthetics surrounding the trail will be protected during and after the timber harvesting activity</p>	<p>The DCR – BOF is appreciative of the support for sustainable forest management on MA State Forests and the trust that the project will well executed.</p> <p>The DCR – BOF received many comments about protecting the M and M trail including suggesting that the trail not be used during the Bass Swamp Timber Sale. At this time it appears that using the trail, which is a long established road, is the best option environmentally and economically for access to the timber sale areas. The AMC in fact recognizes that (see above). Therefore, recommendations for trail buffers and traiside tree retention made by the AMC will be strongly considered in the prescription preparation. After the forestry project is completed, the road / trail will be improved to provide better drainage preventing existing erosion problems and, it will be rehabilitated to at least its existing condition or better.</p>
<p>Janice Starmer</p>	<p>Concerned about the overall objectives for the project especially wildlife habitat.</p> <p>The Warwick Conservation Commission should provide some oversight to the project.</p> <p>Approve of the concept of in kind services being used to gate roads to prevent road damage from ATVs.</p>	<p>The Bass Swamp project area was partially selected for management because there is declining biological diversity in the plantation forests. One of the objectives is to increase forest complexity (and diversity) through harvesting portions of the forest overstory. Increased forest diversity will improve the habitat for many wildlife species.</p> <p>The Warwick Conservation Commission has of this writing sponsored a walk to identify vernal pools in the project area. Per 304 CMR 11.00 Forest Cutting Practices, they will receive a copy of the Forest Cutting Plan for review.</p>

		<p>It is a common practice to use timber sale revenue to improve and protect the DCR property (infrastructure) such as installing road gates. The DCR – BOF appreciates your support in this approach to land management.</p>
<p>Patricia Serrentino</p>	<p style="text-align: center;">South Hawley Crossroads</p> <p>Concerned the DCR - BOF foresters use the most recent information available for certified vernal pools and priority habitat information.</p> <p>Questions posed about protecting wetlands, water resources, and sensitive habitats.</p> <p>Concerns and questions regarding possible skid roads and trails and their being a vector for Invasive species.</p>	<p>A complete site inventory of the proposed project area will be conducted to prepare the silviculture prescription. Full mapping and delineation of water and wetland resources and their protective filter strip areas will be conducted by DCR foresters who are trained to do this to standards set in 304 CMR 11.00 Forest Cutting Practices regulations promulgated from MGL 132 Sections 40 – 46; and 310 CMR 10.00 regulations promulgated from MGL 131 Section 40. In almost all cases the DCR exceeds the above referenced regulations. For instance, the regulations allow harvesting in stream filter strips and wetlands. The DCR-BOF does not make a practice of harvesting in wetlands and will retain 100% cover in filter strips.</p> <p>The South Hawley Crossroads Forest Management Proposal area was given a pre-filing review by the MA Natural Heritage and Endangered Species Program (NHESP). Additionally, the final Forest Cutting Plan will receive a second review for endangered species and habitat by the NHESP prior to it being allowed to proceed. The DCR – BOF will prescribe harvesting based on any Conservation Management Practices set forth by the NHESP.</p> <p>The DCR carefully regulates and monitors harvesting operations through strict contract provisions and well trained foresters. Per contract provisions, logging equipment is cleaned and inspected by foresters before entering state land. Post-harvest monitoring for forest regeneration and invasive species</p>

		is carried out by DCR foresters.
David Galt	<p>South County Road - Florida State Forest</p> <p>Believes that this area would be better served to develop as old growth in a wildland status accumulating carbon rather than harvested and managed.</p>	<p>The Forest Futures Visioning Process and resulting Landscape Designations designated this portion of Florida State Forest as Woodland for many different factors. Every property that is a part of the DCR property system was scientifically evaluated for its value as a Reserve, Park or Woodland designation as documented on pages 5 and 6 and Appendix 9 of the Landscape Designations for DCR Parks & Forests: selection Criteria and Management Guidelines. A significant portion of Florida State Forest (330 acres) was designated as Reserve and connects to the nearly 8000 acres of Reserve in Mohawk Trail State Forest and Savoy State Forest. DCR – BOF believes that the Woodland designation for this portion of Florida State Forest is appropriate based on the evaluation and was well vetted in the public process.</p> <p>DCR – BOF believes with much of the scientific community that balanced forest management that includes harvesting forest products and maintenance of reserves and large trees on the landscape is an appropriate approach to carbon stock management. Responsible and sustainable forest management conducted by large landowners such as DCR is carried out on a landscape scale providing a variety of ecosystem services across that landscape. Therefore the impacts of relatively small projects such as the South County Road Project in Florida State Forest are considered against the entire portfolio of DCR and landholdings and the management approach taken there. See discussion in DCR response to comments Winter Spring 2016.</p>
Susan Masino, Group Comments from: Michael	<p>Berkshire Road and Trail Ash Removal Project</p> <p>Believe that this project plans and</p>	<p>The Project is in a proposal stage, it is not a plan. The proposal document was written to give the reader a sense of (an</p>

<p>Kellett, Eric Chivian, Janet Sinclair, Chris Matera, Ellen Moyer, Ellen Moyer, Glen Ayers, Claudia Hurley, Ray Weber, Lucy Gionfrido, Elizabeth Adams, Meg Shehan, Don Ogden, Elizabeth Ahearn, Dorothy McIver, Michealann Bewsee, Lynn Ballard, Dave Gafney, Hazel Dawkins, Carissa Sinclair, Alison Bowen, Suzanne R. Carlson, Patrick Devlin, Louise Graboski, Catherine T. Driscoll, Steve Ryack, Merideth Bernhardt, Mary Gilbert, Audrey Ortega, James Schilling-Cachat, Rolf Cachat – Schilling, Lisa Turowsky, Lee Anne and Stuart Warner, Miles V. Tardie, Ralph S. Baker, Sandy Kosterman, Ellen Hopman, Tom Neilson, Richard Stafursky, Bill Keck, Susan Massino, Anna Zewinski,</p>	<p>“envisions” cutting large amounts of ash trees with a “massive logging operation”.</p> <p>Fear the spread of emerald ash borer (EAB) will be the result of carrying out this proposal.</p> <p>Suggest biocontrol for the EAB recommended by the US Forest Service and insecticide to save ash.</p>	<p>estimated) amount of DCR land that contains ash near roads and trails. It was not stated that this estimated area and timber volume would be cut. As stated in the proposal document: “It is estimated that only a small portion of the area described above will be presalvaged or salvaged . . . ” Additionally, from the proposal document: “The acres, number of trees and timber volumes described are in terms of the maximum extent of the project area in consideration and are only provided for information. Only subset areas of the project area as they are identified as being infested with EAB will be considered for salvage and presalvage.”</p> <p>The movement of ash and hardwood firewood is regulated by the US Department of Agriculture in the EAB quarantined area. The DCR-BOF and its contractors are compelled to follow the regulations.</p> <p>Biocontrol efforts in Massachusetts have been made using natural, parasitoid predators of the EAB.</p>
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