

**GENERAL FORESTRY COMMENTS AND RESPONSES – Winter Proposals 2016**

<b>Individual or Organization</b>	<b>Public Comment Summary</b>	<b>BOF Response</b>
<p>Ruth Beckley McDowell</p> <p>Robert J. Saquet</p>	<p><u>Sheep Ranch at H.O Cook State Forest.</u> Pleased with the careful details of in the project and the fact that the regrowth of natives forests will occur. Understand that the Norway spruce were planted with the intent of being harvested. Appreciate that road repair and maintenance will be done which should improve access to the forest for recreation, and public safety.</p>	<p>Per internal policy, the BOF provides specific details in the Forest Management Proposal so that the public has a good understanding of the planned project. The plantations at H.O Cook State forest were established under the direction of State Forester Harold Cook for the reclamation of abandoned agricultural land with the intent to eventually provide timber products for harvest. The improvement of the road and trail infrastructure in the State Forests is an integral part of forest management</p>
<p>Judith A. Hall</p> <p>David Richard</p>	<p><u>Brook Road at Wendell State Forest</u> Supports proposed management and feels that it is appropriate to manage the red pine, white pine and oak stands for overall forest health, and native regenerating species. Impacts to recreation and aesthetics will be minimal. Supports forester expertise and forest management on state lands.</p> <p>Appreciates wildlife benefits resulting from forest management. Especially wants to incorporate recommendation from MA Division of Fish and Wildlife for clearcuts in the white pine stand to improve whip-poor-will habitat (J.Hall).</p>	<p>The BOF appreciates the support.</p> <p>The wildlife benefits from management in this project will be diverse. Creating forest openings as recommended by the MA Division of Fish and Wildlife can provide excellent habitat conditions for species such as the whip-poor-will.</p> <p>The alternative proposal to clearcut portions of the white pine stand to create early successional forest conditions to benefit specifically whip-poor-will is still under consideration.</p>
<p>Appalachian Mountain Club (AMC)</p> <p>Appalachian Trail Conservancy(ATC)</p>	<p><u>Heaphy Richardson Lot – October Mountain State Forest</u> Appreciates collaboration by DCR with AMC and ATC to minimize impact to the Appalachian Trail (AT). Acknowledges and supports responsible forest management on DCR land and agrees with proposed silviculture.</p> <p>Requests that the DCR follow</p>	<p>The DCR – BOF appreciates the cooperation and support offered by the AMC and ATC.</p> <p>The DCR BOF will follow its responsibilities and the restrictions noted in the MOU during harvesting operations on the Heaphy Richardson Lot. The BOF will also include additional recommendations made by AMC and ATC in the project silviculture prescription</p>

	<p>responsibilities and restrictions in the Memorandum of Understanding (MOU) between MA public and private entities specifically the Appalachian Trail Corridor and follow other recommendations to protect the AT.</p>	<p>which will then be implemented during the project timber sale.</p>
<p>Dan Ogden Sharl Heller Michael Kellet et. al.; Restore the North Woods</p>	<p><u>All Eight Forest Management Proposals</u></p> <p>Very concerned about global climate change and how Massachusetts forests contribute to the solution.</p> <p>Recognized that the DCR took a positive step with the Forest Futures Visioning Process (FFVP), looking at forestry differently, charting a new course for management including an ecosystem services approach which acknowledges carbon sequestration as such.</p> <p>Concerned that the DCR – has disregarded the recommendations of the FFVP and not made a “land paradigm shift”.</p> <p>Concerned that the DCR has returned to business as usual with no accountability for carbon sequestration and climate change.</p> <p>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.</p>	<p>The DCR – BOF concurs strongly that global climate change is an issue of great concern. The DCR has long spoken of our mutual concern over climate change and has advocated for measures, including forest management strategies that help sequester and store carbon that will take steps toward ameliorating global climate change. The DCR recognizes that keeping forests as forests in a rapidly urbanizing Northeast is the most important contribution that can be made in relation to carbon storage, sequestration and mitigating climate change (Woodall et al 2015; Thompson et al 2014). The DCR continues to be the leader in Massachusetts and the country in forest conservation through the purchase and conservation of over 29,000 acres of forest in the last 10 years that will keep forests as forests forever. The carbon sink that these forests provide is evident in the Continuous Forest Inventory (CFI) the DCR – BOF has conducted for 55 years. The CFI data indicates that the current forests of the DCR State Forest, Parks and Reservation system have accumulated 8.1 million tons of carbon in the time period 1960 - 2014<sup>1</sup>.</p> <p>The DCR – BOF appreciates the recognition that steps were taken to improve forest management approaches through the FFVP. <a href="#">The Landscape Designations for DCR Parks and Forests: Selection Criteria and Management Guidelines</a> (LD) implemented the recommendations of the FFVP in 2012. The LD designated a significant portion of DCR land (~111,000 acres) as Reserves where carbon storage and sequestration is the major ecosystem service provided.</p>

		<p>The LD has further implemented the FFVP recommendations directing that an ecosystem services approach is to be used on Woodlands listing carbon sequestration as a specific ecosystem service; and that uneven age forest management is emphasized (pages 37 and 38 of LD).</p> <p>The DCR believes that an important “land paradigm shift” <u>has</u> taken place. Uneven age or all age management is emphasized in the eight forest management proposals. Of the 1570 acres proposed for management, 1275 acres or 81% is slated for uneven age management and irregular shelterwood , a continuous forest cover management system. Additionally, all of the projects will leave coarse woody debris on site and snags per the LD structural retention guidelines. Research indicates that actively managed forests that use low intensity forest management regimes, that provide for post harvest structural retention, and produce permanent wood products, as will happen in the vast majority of the eight projects, sequester substantial amounts of carbon and should be considered as a part of a carbon stock portfolio (Fahey et al., 2009; Nunery and Keaton 2010).</p> <p>As the DCR-BOF has been conducting long term forest planning, carbon stock management has had a significant role. Modeling of carbon storage for the recently approved <a href="#">Western CT Valley Forest Resource Management Plan</a> indicates carbon storage will steadily grow over time using the management regimes recommended (page 37). This is also emphasized through growth modeling of our forest management practices that indicates we will only be harvesting approximately 12% of the growth on Woodlands (page 111).</p>
--	--	--

		<p>Although most of the eight forest management projects do not specifically mention carbon sequestration, carbon management is inherent as described above in all of the projects through the Landscape Designations and Guidelines behind these projects, our new forest management paradigm and the long term forest planning effort underway at the BOF.</p> <p><i><sup>1</sup>The Massachusetts CFI is comprised of 1900 permanent plots, most of which were established in 1960. Every 10 years each tree on each plot is visited to determine its health, growth or mortality. The volume growth is calculated for each tree on each plot and extrapolated to all DCR forest land to determine tons of biomass growing and tons of carbon sequestered.</i></p>
--	--	---

**REFERENCES CITED**

Fahey, TJ et al, 2009, Forest carbon storage: ecology, management, and policy, Front Ecol Environ 2009, doi:10.1890/080169, Ecological Society of America

Nunery, J. S. & Keeton, W. S. Forest carbon storage in the northeastern United States: Net effects of harvesting frequency, post-harvest retention, and wood products. Forest Ecol. Manag. 259, 1363–1375 (2010).

Thompson, J. R., K. Fallon-Lambert, D. R. Foster, M. Blumstein, E. N. Broadbent, and A. M. Almeyda Zambrano. 2014. Changes to the Land: Four Scenarios for the Future of the Massachusetts Landscape. Harvard Forest, Harvard University. ISBN:9780615985268.

Woodall, C. W. et al. Monitoring Network Confirms Land Use Change is a Substantial Component of the Forest Carbon Sink in the eastern United States. Sci. Rep. 5, 17028; doi: 10.1038/srep17028 (2015).