

**From:** Glen Aspeslagh [glen@ecamm.com]  
**Sent:** Thursday, November 29, 2012 12:45 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on Proposed Harvests

To whom it may concern:

I have a few general comments (really questions!) on the new timber harvest proposals at Freetown/Fall River, October Mountain, Sandisfield, Leyden, Federated Women's Club and Sudbury-Malborough state forests:

- 1) I do not see any of these six state forests on the list of Resource Management Plans underway or approved by the DCR Stewardship Council as required by Massachusetts General Law Chapter 21 Section 2F. I would certainly like to see this take place, and want to know if the RMPs be completed and approved as required before any project commences?
- 2) The Federated Women's Club proposal is sited within the Quabbin Reservoir watershed. I do not think it is a good idea to perform timber harvesting within the watershed of a major drinking water supply. I also wonder if any oversight or guidelines by the Division of Water Supply Protection will be provided?
- 3) I realize there is a pretty detailed description of the planned treatment in each proposal, but for us non-forester types, it's tough to understand some of the terminology. A maximum opening gap size should be stated explicitly in each proposal. Will for example, will 2-3 acre gaps be opened?
- 4) What is the projected revenue from each project? I did not see it stated anywhere in the proposals, and it would seem to be a major consideration in any project proposal. Knowing what we should expect for revenue would allow the public to weigh the potential loss of cultural resource and ecological resources against any financial benefit to the Commonwealth.
- 5) There is no mention of how these Harvesting Limitations will be enforced. For example, what penalties would a logging company face if they failed to observe a limitation such as a buffer zone or incorrect equipment use?

Thanks for your time,

Glen Aspeslagh  
1132 Salem St  
North Andover, MA 01845

**From:** Ed Klaus [ed\_klaus@yahoo.com]  
**Sent:** Saturday, December 08, 2012 11:44 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Leyden State Forest

Hello,

As the Leyden appointed tree warden,I ask that you keep the state forest in active management.It is in desperate need of a least a major thinning.I recomend turning it into an uneven forest where it will serve a better need,to the wildlife and people who use it for recreation.The spruce there now serve no purpose and should be cut.

Thanks,  
Ed Klaus

Department of Conservation and Recreation  
 Bureau(s) of Forest Fire Control and Forestry  
 Timber Harvest Summary-Public Comment Form  
 August 7, 2007

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

The following are my concerns about the Timber Harvesting Project being proposed at

Name of Timber Sale Project: Egg Shell Lot  
 State Forest: Sandwich  
 Management Forester: Lynn Chman

Forest Health:

This stand sounds overstocked, with a high % of Beech. A  
 dense beech needs to be cut + treated, water shed is out of  
 direct water supplies. Ash is needed to be salvaged + some  
 healthy ones left to seed in.

Recreation:

limited to local hunting + walking. opening of stand  
 roads will help recreation.

Water Quality:

Areas of timber within buffers should also be thinned  
 not left along to promote a healthy buffer. A cable  
 skidder is recommended so this can be easily done.

Aesthetics:

This lot is not along a major road and is behind  
 homes + beaver ponds so minimal impact. Main use  
 is by people who understand the natural effects of logging +  
 approve of it. I see the problem as trying to  
 hide logging from the public (uninformed) rather  
 than educating them on the many benefits.

Wildlife/Rare Species:

This harvest will help wildlife. The only problem is not cutting large enough openings which would help all wildlife more. But by adding to existing sapling growth will create a nice multi stage area.

Cultural Resources/Special Places:

no impact.

Economic Impacts: This is not a section in this comment form and should be seen this was an original intent of the State forest system. This helps the local logger, stave, gravel dealers, fuel dealers, etc. and is vital!

Other:

This harvest sounds as good as it could be under the new "Vision". Promoting the established Red Oak, Cherry, Ash and other intolerant species in this overgrown stand. By not making openings these species need to be protected. This harvest sound good for bee because by keeping a fully stocked stand after harvest this will knock back the high summer of the fern growth so be treating the beech the best tree Hard Maple will have a good chance to grow in this intolerant environment being damaged.

Name: Thomas L. Anderson MA Forest 263  
Address: 471 Blawie Rd Granville MA CT " 47  
Phone Number: 413-923-8375 01034 SAF " 865

also the Ash needs to be salvaged while still worth money

Public comments can be submitted by e-mail to: [Timber.comments@state.ma.us](mailto:Timber.comments@state.ma.us) or fax to: (413) 545 5995 or mailed directly to the responsible Management Forester by 5:00 p.m. prior to the completion of the 45-day public comment period which is posted on the project summary.

Please contact David Goodwin, Acting State Lands Management Program Supervisor at (413) 545-5748 if you have questions about the Timber Harvesting Summary public comment process.

Department of Conservation and Recreation  
Bureau(s) of Forest Fire Control and Forestry  
Timber Harvest Summary-Public Comment Form

August 7, 2007

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

The following are my concerns about the Timber Harvesting Project being proposed at

Name of Timber Sale Project: Breezy Knoll  
State Forest: Leyden State Forest  
Management Forester: Nick Anzuoni

Forest Health:

Poor overgrown needs cutting

Recreation:

minimal

Water Quality:

The wetland buffers should also be cut to increase the stability of the buffer.

Aesthetics:

minimal use in the area will allow for a better harvest to get rid of this overgrown non-native spruce. The wildlife will love the way it looks.

Wildlife/Rare Species:

This will be great for wildlife because I envision the under story as non-existent now and opening it up will get regeneration established

Cultural Resources/Special Places:

minimal

Other:

No category for economic impact and this was a major goal for establishing the State forests in the first place. Salvage the spruce now before we as taxpayers need to pay for a clean-up like Robinson state park.

Name:	Thomas L. Anderson	MA Forester	263
Address:	471 Blandford Rd Greenville MA	CT	47
Phone Number:	413-923-8375	SAF	865

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Department of Conservation and Recreation  
 Bureau(s) of Forest Fire Control and Forestry  
 Timber Harvest Summary-Public Comment Form  
 August 7, 2007

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

The following are my concerns about the Timber Harvesting Project being proposed at

Name of Timber Sale Project: Sherlock lot  
 State Forest: October mt.  
 Management Forester: Chris Massini

Forest Health:

Poor health disease, ice damage + over stocking  
requires work to reestablish a quality stand.

Recreation:

This work will enhance recreation thru improved  
access + soft safer trees to be near.

Water Quality:

The wetlands sound stable due to rocky nature therefore  
the wetlands should be protected as well to increase  
stability

Aesthetics:

The stands sound like they are in such poor shape  
a harvest will only increase the appearance. Also I  
don't see why a buffer is needed, don't try to hide  
good forestry work work up to the roads.

Wildlife/Rare Species:

Wildlife will be enhanced. The deer range should be protected as much as OSHA allows.

Cultural Resources/Special Places:

minor impact

Other:

The economic effects of these harvests is a category here and should be, being a major goal of these forests becoming State Forests in the 1<sup>st</sup> place. This sale sounds like a relatively low value sale due to poor quality. But still needs to be done! So we don't have another Robinson State Park mess where instead of selling wood we as taxpayers paid to have crews clean up trees with Blue paint on them. Cut them now and get something.

Name:	Thomas L. Anderson	MA Forester	263
Address:	471 Bradford Rd Granville MA 01034	CT	47
Phone Number:	413-927-8375	SAF	868

Public comments can be submitted by e-mail to: [Timber.comments@state.ma.us](mailto:Timber.comments@state.ma.us) or fax to: (413) 545 5995 or mailed directly to the responsible Management Forester by 5:00 p.m. prior to the completion of the 45-day public comment period which is posted on the project summary.

Please contact David Goodwin, Acting State Lands Management Program Supervisor at (413) 545-5748 if you have questions about the Timber Harvesting Summary public comment process.

**From:** richard stafursky [rhstafursky@yahoo.com]  
**Sent:** Monday, December 31, 2012 12:21 PM  
**To:** Comments, Timber (DCR)  
**Subject:** DCR logging plans Timber Comments Stafursky

December 31, 2012

Jessica A. Rowcroft  
Bureau of Planning and Resource Protection  
Department of Conservation and Recreation  
251 Causeway Street, Suite 600  
Boston, MA 02114  
[Timber.Comments@state.ma.us](mailto:Timber.Comments@state.ma.us)

**RETURN THE FOREST**  
**(Stop DCR's Species' Forest-Killing Plans)**

Please return the species' forest and let Massachusetts be the first state to end forest harvesting on publicly controlled land. Today's citizens expect all the states to take good care of forests. The Commonwealth of Massachusetts can be known around the world as the keeper of the species' forest, not as just another US state that gives away forests.

I disagree with Massachusetts Department of Conservation and Recreation's (DCR) logging plans (The Vision for Massachusetts Forests and the Current Forestry Vision & Implementation). I ask that state logging plans be abandoned as harmful and foolish. They are no model of forestry nor are they a model of a healthy forest. In good faith, DCR plans should be replaced by one universal model and plan to return the species' forests.

Do not listen to those who have cut the forest in the past. Ignore the loggers' claim of forest entitlements. Shame on state ecologists who talk of "balance." Shame on those "conservation" organizations and land trust administrators who log species forests. Pounce on those who talk of the forest as only a resource. Loggers do not understand nor do they speak for the species forest. How could they? They are users not keepers. Laugh when someone claims that logging is healthy for the forest; it is not. There is no forestry science that can possibly justify native canopy destruction and the torturing of the Great New England forests of Massachusetts. Cutting native trees every twenty or thirty years perpetuates a sick forest.

**SPECIES FOREST** (aka species' forest) is a forest of, by and for all the other species native to that forest. People do not manage a returned species forest. Species forest

cannot be defined categorically, because it is not simply one of many forest types. Species forest is not a forest definition which a field technician can use in a study. Species forest means occupancy, and the occupants are named in the expression. The rightful occupants are all the other native species of plants, animals, fungi and soil microbes. Related terms are species' prairie, species' desert, species' mountain, species' sea, species' grassland, etc.

#### DCR forest terms de-coded

DCR'S forest vision      the deadly trident of woodlots, playgrounds and forest curiosities

WOODLANDS              woodlots for loggers

SILVICULTURE            agricultural planting and harvesting and dumbing down of the forest

"BEST ECOLOGICAL FOREST MANAGEMENT"

"HEALTHY FOREST"

"BEST MANAGEMENT PRACTICES"

"GOOD FORESTRY"      under DCR none of these is best for the species' forest

STAKEHOLDER        for resources, money, NIMBY or accolades

BALANCE                no such thing; the forest always loses

A species' forest is healthy. It is best for the climate, soil and water; is low maintenance; and is loved by the public. A logged and groomed forest is none of these things.

Please include this letter in the minutes of the public review concerning DCR Current Forestry Vision & Implementation forest harvesting plan and all other files having anything to do with the following six forest-cutting projects: Freetown State Forest, Marlboro-Sudbury State Forest, Federated Women's Clubs State Forest (near Quabbin Reservoir), Leyden State Forest, October Mountain State Forest (largest one, near Lee), Sandisfield State Forest.

Sincerely,

Richard H. Stafursky, overseer and originator of the 501c3, 84-acre Species List Forest, Conway, MA US  
155 Belmont Avenue

Brattleboro, VT 05301

phone 802 257 9158

<http://wslfconwaymausa.blogspot.com/>

<http://speciesforest.blogspot.com/>

[http://en.wikipedia.org/wiki/Natural\\_landscape](http://en.wikipedia.org/wiki/Natural_landscape)

cc:

Deval Patrick, Governor of Massachusetts

Senators and Representatives (state)

Senators and Representatives (federal)

Richard K. Sullivan, Jr., Secretary of Energy and Environmental Affairs

Edward M. Lambert, Jr., Commissioner DCR

Massachusetts Climate Change Adaptation Advisory Committee

Town of Conway

State Forest Friends groups

**From:** Muffy Burnham [muffyburnham@gmail.com]  
**Sent:** Saturday, January 05, 2013 9:38 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Timber Harvest Comments

Please record my strong opposition to any timber cutting in CoPeace S1 in the Southeastern Massachusetts Bioreserve until the formerly beautiful Rattlesnake Brook hills and stream are restored. It is a shame your state agency allowed this damage to occur.

Sincerely,  
M. P. Burnham

**From:** btrekman@comcast.net  
**Sent:** Saturday, January 05, 2013 4:39 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Logging

Dear Director of Forest Stewardship,

Any commercial timber cutting in the Freetown State Forest section of the Southeastern Massachusetts Bioreserve must be put on hold until a complete survey is done of which species will benefit and which will be harmed by commercial logging in this bioreserve area.

We here in Southeastern Massachusetts fought hard and long to create the Bioreserve and we do not want to see it ruined by some foolish logging. It is extremely important to ensure the diversity we now have is not destroyed.

I am also requesting that you remove Stand 1 (S1) from consideration for logging until the severely eroded land in that area is repaired and Rattlesnake Brook is restored.

Please keep me informed of your decisions in this crucial matter

Sincerely,

Brian Pearson / Chairman of the Fall River Bicycle Committee

508-678-3814 - [btrekman@comcast.net](mailto:btrekman@comcast.net)

**From:** Barry French [barryfrench@yahoo.com]  
**Sent:** Saturday, January 05, 2013 8:18 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Co-Peace S1  
**Attachments:** 740688\_513055875400975\_70803727\_o.jpg; 736213\_513056302067599\_1540362023\_o.jpg

To the Director of Forest Management:

This is in response to the invitation for public comments regarding commercial logging of "Co-Peace S1" in the Freetown State Forest.

I have viewed the proposed site adjacent to Rattlesnake Brook near Route 24 and Copicut Road in Assonet. There are deep ruts leading to the brook, apparently caused from use of recreational vehicles. The damage of these deep ruts should be restored to their natural state before any logging commences. This is for a variety of reasons, not the least of which is to protect the brook and its natural wildlife.

The Bioreserve is a tremendous natural resource initiated and maintained by the City of Fall River, the Trustees of Reservations, the Department of Conservation and Recreation and the enthusiasm of many citizens including members of the Green Futures organization.

I am suggesting a comprehensive plan solely to enhance the mission of the Bioreserve of natural resource management before the commencement of any commercial logging in the Forest.

There are many citizens of our region who perhaps will never visit a national park such as Acadia, Yellowstone or Yosemite, and with all of our mutual cooperation and enthusiasm our treasured Bioreserve, we should hope, will be here for all of our citizens now and forever, to enjoy. The cliff overlooking Rattlesnake Brook at the proposed site is just one of the many, many beautiful natural sites in the Forest.

As a Freetown Cub Scout and a Boy Scout going back more than 60 years, we were often in the Forest. One thing we learned as a scout, was to leave our campsite better than found. That good and valuable motto applies to much of everything in life, and together, with cooperation and mutual enthusiasm, it will prevail into the future so that all may benefit.

Respectfully submitted,

Barry French

Pictures attached

**From:** tomocelot@comcast.net  
**Sent:** Sunday, January 06, 2013 9:51 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Co-Peace S1 - comments

*Dear Director of Forest Stewardship,*

With regard to the location designated as "Co-Peace S1" in the Freetown State Forest in the Southeastern Massachusetts Bioreserve and the proposed commercial logging plan for this location:

I would respectfully request that DCF delay this logging plan until the valley slopes are stabilized, ruts filled, and brook restored. This area was formerly one of the gems of the entire State Forest. Unfortunately, illegal use of the area by off-road vehicles has caused much erosion and other damage. This needs to be remediated before consideration of logging in the area. The Southeastern Massachusetts Bioreserve, which includes the Freetown State Forest, needs a comprehensive plan in place that enhances, not detracts, from the mission of the Bioreserve, before commercial logging permits can be issued.

Thank you,

Thomas Athearn  
Fall River, Massachusetts

**From:** Stefani Koorey [skoorey@mac.com]  
**Sent:** Sunday, January 06, 2013 10:23 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Co-Peace S1 Comment

Dear Director of Forest Stewardship,

I attended a site visit to the area under consideration for commercial logging and was absolutely appalled by the erosion I saw, all caused by man----man doing illegal things like running dirt bikes up the hillside causing huge ruts and the ATV invasion. I witnessed direct evidence of trucks trespassing the blocked entrance and contributing the the rutting of the trail.

I oppose commercial logging anywhere in the Southeastern Massachusetts Bioreserve, which includes the Freetown State Forest, until you produce a thorough and comprehensive plan to repair this damage so that generations of pedestrians can once again enjoy the forest. I ask that planning for commercial logging of Co-Peace S1 stop immediately. The brook environment must be restored.

I took over 60 photos of the erosion and would be most happy to share them with you if you would like to see the damage as of yesterday.

Regards,  
Stefani Koorey  
Fall River, MA

**From:** Lori Sweeney [cyclical@verizon.net]  
**Sent:** Monday, January 07, 2013 4:32 PM  
**To:** Comments, Timber (DCR)  
**Subject:** damage to the Southeastern Massachusetts bioreserve

Please stop all logging/timber cutting until the valley hills are repaired and the brook restored.

**From:** GaladrielGaunt@comcast.net  
**Sent:** Tuesday, January 08, 2013 8:38 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Damaged Land in The Freetown State Forest

Hello,

I am a local based photographer in southeastern Massachusetts. At least 70% of my portfolio is of the bioserve. Please reconsider the intention to log Co Peace sS1. Please?

I have attached some art pieces that I hope will say it better than words ever could.

Thank you  
Sincerely  
SeraBray  
Photography

**From:** Gregory, Paul (DCR)  
**Sent:** Wednesday, January 09, 2013 10:29 AM  
**To:** Hill, William (DCR); Church, Peter (DCR)  
**Subject:** FW: Important Bird Area Freetown/Fall River State Forest

FYI.

Paul

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Paul Gregory  
Management Forester  
Department of Conservation and Recreation  
194 Cranberry Road  
South Carver, MA 02366  
Office: (508) 866-2580 ext. 121  
Fax: (508) 866-7736  
[Paul.Gregory@state.ma.us](mailto:Paul.Gregory@state.ma.us)

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**From:** Joseph Larson [mailto:[larson@tei.umass.edu](mailto:larson@tei.umass.edu)]  
**Sent:** Wednesday, January 09, 2013 10:20 AM  
**To:** Gregory, Paul (DCR)  
**Cc:** MacCallum, Wayne (FWE); Wayne Petersen  
**Subject:** FW: Important Bird Area Freetown/Fall River State Forest

Dear Mr. Gregory:

I am responding to your invitation to comment on the Freetown Co-peace Forest Management Proposal.

Under the Wildlife section of the Proposal the State Forest is recognized as an Important Bird Area (IBA) by the Massachusetts Audubon Society. However, the specific bird species on which this designation is based are not listed nor is there any discussion on how the proposed forest management treatments are expected to impact the habitat of these species.

Below is information supplied by Wayne Petersen who heads up Audubon's IBA Program. Mr. Petersen's comments and the Audubon data call attention specifically to the Eastern Towhee, Ovenbird, Prairie Warbler, Acadian Flycatcher, Worm-eating Warbler, Hooded Warbler and Canada Warbler. Audubon's 2011 State of the Birds Report provides details on the population status of these birds.

I also call your attention to the Division of Fisheries and Wildlife's 2011 public comment to Commissioner Lambert on DCR's Proposed Landscape Designations wherein DFW lists the Eastern Towhee and the Prairie Warbler as species of greatest conservation need requiring young forest and shrubland habitat. Species of greatest conservation need are whose populations are in decline due to loss of habitat. If habitat for these species is not restored they may become candidates for state-listing.

#### Recommendation

I suggest that the Proposal be expanded to identify the IBA species, noting the two of greatest concern. Additionally, I suggest that there be added to the text a section discussing how the planned forest treatment will likely affect their habitats (increase, decrease, or no change).

Sincerely,

Joseph S. Larson, Ph.D.  
Member (Endangered Species)  
Massachusetts Fisheries and Wildlife Board  
27 Arnold Road  
Pelham, Massachusetts 01002-9757  
USA

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**From:** Wayne Petersen [<mailto:wpetersen@massaudubon.org>]  
**Sent:** Thursday, December 20, 2012 5:58 PM  
**To:** Joseph Larson  
**Subject:** RE: Important Bird Area Freetown/Fall River State Forest

Hi Joe,

Sorry for the tardy reply to your request. This has been a very busy month already, so I'm afraid this nearly slipped off my radar screen! ☹

Below I'm pasting some material that Jack Lash provided when he initially nominated the Freetown SF as an IBA. In addition, I can tell you from personal experience that the annual or nearly annual and probable breeding presence of Acadian Flycatcher, Worm-eating Warbler, Hooded Warbler, and Canada Warbler are all notable species for this site. Indeed, the presence of Hooded Warblers makes Freetown one of very few states in the Commonwealth where this species is suspected to nest. Additionally, the extend of the forest there makes it possible to support a number of interior forest species in numbers far higher than in many areas of comparable acreage.

I hope this is helpful, and if I can offer more assistance please let me know.

**Site Description:**

This IBA includes a large contiguous acreage comprising forest of various successional stages, and wetlands, including a 5,500-acre Massachusetts state forest as well as a similar-sized cedar swamp, a municipal public water supply, and both public and nonprofit protected areas. Because the area has received designation as a bioserve, there is increased interest in habitat management, research, and monitoring of flora and fauna.

**Current Conservation Status:**

The area includes the Freetown State Forest, along with the entire 14,000-acre Southeastern Massachusetts Bioserve. The Freetown State Forest and Acushnet Cedar Swamp are operated and owned by the

Massachusetts Department of Conservation and Recreation (DCR). In addition to DCR several other local and state and nongovernmental organizations are landowners; and partners are involved in the study and management of the bioreserve, including MassWildlife, The Trustees of Reservations (TTOR), and the city of Fall River. Primary threats pertain to occasional ORV and ATV use, invasive species, and Brown-Headed Cowbirds. Access to waterfowl counts and other studies are limited by public water supply regulations. An adjacent quarry tied in with Boston's "Big Dig" project is very active. Housing abutting public land is increasing annually. Road salt from the adjacent highway is affecting northwestern portions of the bioreserve and Rattlesnake Brook.

**Ornithological Significance:**

At least seven regional, and one species having high conservation priority in Massachusetts breed within this area in high concentrations (e.g. Eastern Towhee 60, 1994 2000): Ovenbird, and Prairie Warbler 35, 1994 2000). Birders have visited the bioreserve during Christmas Bird Counts (CBC), spring migration bird counts. Breeding Bird Surveys (BBS) and recent Biodiversity Day events. CBCs and BBSs have been conducted since 1970. In lieu of recent Bioreserve designations, monitoring studies on permanent plots are in place. Northern Parula has been reported several times in recent years. Overall, the state forest supports important avian habitat diversity, especially the Rattlesnake Brook area. The area is also due to its significant wetland habitats.

**State Listed Species:**

Species	Breeding	Winter	Migration
Northern Parula	*	*	7 1994,2000

\* None known

**Other Flora or Fauna of Significance:**

Eastern Box Turtles (special concern) and Spotted Salamanders have been recently confirmed at this site, and the Mystic Valley Amphipod, a freshwater crustacean, also occurs at the Acushnet Cedar Swamp. Rare flora include; Small Yellow Lady's Slipper (endangered), Heartleaf Twayblade (endangered), and Climbing Fern (special concern).

**Data Sources:**

Most data are from the South Shore Bird Club, MassWildlife District Biologists, personal observations by local birders, and tallies by Epsilon Associates, an EOEIA-contracted consulting group. Data are also from migratory counts, BBS: CBCs, and presence/absence counts by DCR staff. Breeding species confirmed by Veit & Petersen, DeGraff, et al.

All the best for the Holidays!

Wayne

Wayne R. Petersen, Director  
 Massachusetts Important Bird Areas (IBA) Program  
**Mass Audubon**  
 208 South Great Road  
 Lincoln, MA 01773

(781) 259-2178

***Protecting the Nature of Massachusetts***

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**From:** Joseph Larson [<mailto:larson@tei.umass.edu>]  
**Sent:** Saturday, December 08, 2012 3:53 PM  
**To:** Wayne Petersen  
**Subject:** Important Bird Area Freetown/Fall River State Forest

Wayne:

I have been reviewing six DCR plans to resume harvest cuts on six DCR properties across the state. One of these is in the Freetown/Fall River State Forest. In the text DCR notes that the Forest is one of Audubon's Important Bird Areas. But they do not state which birds are the subject of this designation nor do they discuss how their planned cutting may impact.

See: <http://www.mass.gov/dcr/news/2012/11-27adv.pdf>

I assume that each IBA has been designated important to specific species for which the habitat is critical. DCR has done a good job of identifying the presence of priority habitat and incorporating best management practices for any listed species on the six projects. But I am concerned that they have not done the same for bird species at risk because of decline in early successional grassland and forest habitats. In the case of Freetown I think that they ought to list the IBA birds of interest and discuss possible impacts.

Can you tell me what species are key in the Freetown IBA?

Joe

**From:** John Clarke [johnclarke365@gmail.com]  
**Sent:** Wednesday, January 09, 2013 2:33 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Proposed Timber Harvests

I am writing to express my full support of the proposed timber harvests as described by DCR foresters. These foresters are licensed and trained to manage forests for the long-term benefit of the public.

Sincerely,

John R. Clarke

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John R. Clarke, MBA, ISA Cert. Arborist, MA&CT Lic. Forester  
Forester, T. Jepson & Son, LLC  
[www.tjepsonandson.com](http://www.tjepsonandson.com)



**T Jepson & Son**

c: 508.963.2070 f: 508.885.5683

**From:** Peter Miles [pmiles@northlandforest.com]  
**Sent:** Wednesday, January 09, 2013 3:53 PM  
**To:** Comments, Timber (DCR)  
**Subject:** UPCOMING PROPOSED TIMBER MANAGEMENT HARVESTS.....

Greetings!

This is great news to hear that the management of these forested lands is moving forward. Like any uncared for garden these forests will also fall into disrepair and begin to do a poorer of job of contributing to our environmental, recreational and economic wellbeing.

Congratulations,  
Peter Miles

**From:** Keith Argow [argow@cs.net]  
**Sent:** Wednesday, January 09, 2013 4:46 PM  
**To:** Comments, Timber (DCR)  
**Cc:** jhutchins@massforestalliance.org; Church, Peter (DCR)  
**Subject:** Proposed Forest Mft. MA State Forests

**Forests are a resilient living ecosystem. They can both benefit or be harmed by man's treatment of them. The proposed timber management programs are an example of benefiting from well thought out stewardship.**

**Increasingly private woodlands in Massachusetts are setting the standard of sustainable management of all the forest resources including clean water, natural habitat, recreation, as well as timber production that provides jobs by a factor of at least 5.**

**So should state forests exemplify the best in forest management. This will inspire more private woodlands owners with an example all are proud of.**

**We hope you will implement the proposals.**

**Keith A. Argow, PhD, CF  
President  
National Woodland Owners Association  
374 Maple Ave E, Suite 310  
Vienna, VA 22180  
703.255.2700; [argow@cs.net](mailto:argow@cs.net), [www.nwoa.net](http://www.nwoa.net)**

**From:** Scott Gerrish [scottgerrish@yahoo.com]  
**Sent:** Wednesday, January 09, 2013 7:05 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Harvesting on State Land

To whom it may concern,

It is environmentally prudent to manufacture and utilize products, ie wood products, as close to the resource as possible. As a State, Massachusetts is a leader in responsible timber harvesting. MGL 132 and the NHESP do a good job of protecting our forests, wildlife and water quality. As the State continues to discourage timber harvesting, it continues to lose our forest products infrastructure. The loss of our forest products industry will make it more difficult for private landowners to profitably grow forest products. Poor timber markets are likely to cause some forest landowners to pursue alternate income sources such as development. Those responsible for stopping harvesting on State Forests are showing a disregard for global warming, preserving open space and other environmental issues.

Sincerely,

Scott Gerrish  
Brimfield, MA  
Private Landowner & Consulting Forester

**From:** Jeff Heroux [jeffreyheroux@hotmail.com]  
**Sent:** Wednesday, January 09, 2013 9:02 PM  
**To:** Comments, Timber (DCR)  
**Subject:** DCR Logging Plan

Dear Director of Forest Stewardship,

I would like to state my opposition to commercial logging in the Freetown State Forest on the grounds that the plan as is does not meet the mission of the Southeastern Massachusetts Bioreserve. The plan does not encourage biodiversity. I request the planning for Commercial logging of Co-Peace S1 stop immediately until the damage caused by illegal activity on that land is halted and the forest and brook environment are restored.

Respectfully,

Jeffrey Heroux  
35 Alice Street  
Fall River, MA

**From:** Robert Saquet [rob@coldrainfarm.com]  
**Sent:** Wednesday, January 09, 2013 11:54 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Timber Harvesting Comments

To: Peter Church  
Director of Forest Stewardship

From: Robert J. Saquet

Subject: Commercial Timber Harvesting

Date: 9 January 2013

Mr. Church,

I am writing to you in order to show my support for the Commercial Timber Harvests proposed for this year in 6 of our DCR forests. I have owned a 50 acre woodlot directly abutting H.O. Cook State Forest in Colrain since 2005 and I am a member of the Massachusetts Forestry Alliance. I have personally watched 2 harvests that were conducted in H.O. Cook, and I am pleased with the outcomes. The results of these cuts are a healthier forest, a healthier wildlife population, and jobs created. I hope that these 6 projects can be successfully completed and that they set a precedent for similar projects in our State Forests in the near future.

Respectfully,

Robert J. Saquet  
10 Robyn Ln  
Mansfield, MA 02048

**From:** Annette King [aktk@verizon.net]  
**Sent:** Thursday, January 10, 2013 6:00 AM  
**To:** Comments, Timber (DCR)  
**Subject:** state&quabbin timber sales

Politics!

Who screams the loudest ! That is what this is all about.

The State had no right to stop logging completely when work was being done on a professional level. It will go back to normal logging, because nothing was being done wrong. No one considers the millions of dollars in revenue lost because of the shut down.

I have been logging for over 35 years in this state and have never seen a bigger waste of time and money by the state and these no gooders.

Disappointed,  
Tom King

King Timber Harvested, Inc.  
15 Ragged Hill Rd.  
Hubbardston, MA 01452

**From:** Robbo Holleran [robbo@vermontel.net]  
**Sent:** Thursday, January 10, 2013 9:40 AM  
**To:** Comments, Timber (DCR)  
**Subject:** recent proposals

To whom it may concern:

I will provide general comments in support of the forest management proposals. I am an active consulting forester with 30 years experience, mostly in Vermont. I hold Mass Forestry License # 397, and was selected by Bill Leak to assist with the revisions of the Northern Hardwood Silvicultural Guide.

First, in a philosophical sense, forest management is an important aspect of forest health, habitat and species diversity, and provides a wide range of social and environmental benefits. The Forest Visioning process addressed the range of philosophical arguments, and concluded on an area designation: Parks, Reserves and Woodlands. Those who are philosophically opposed to harvesting have a significant "piece of the pie" in the Reserve category. If the proposals included commercial logging in Reserves, they should be rightfully upset. However, as forest managers, we will routinely set aside management options for portions of productive woodlands, and this is addressed in your proposals. Since the proposed harvest areas are designated for productive timberland, philosophical "anti-harvesting" sentiment should be discounted.

Second, in a silvicultural sense, the proposals are all valid, and I commend you on the approaches selected. To overcome beech resprouting in areas designated for regeneration, I would suggest that daylight and ground disturbance are the best tools, and the more that can be provided will reduce the need for herbicide or post-treatment. In patch cuts we do, we try to get the skidder operator to scarify as they go, which is a tiny cost for them while the skidder is on the site. The small patches of residual understory beech that get missed are almost always successful to out-compete more desired species. Post treatment with herbicides has the problem of damaging desired regen, which is often present, just under the offending beech. And post treatment spraying may control the beech, but does not provide the scarification needed for new seedling establishment, since you already have a few years of leaves, etc on the surface. Therefore, I would encourage you to aggressively control understory beech during the harvest operation.

Exposed mineral soil should be a goal.

Deferred shelterwood is an excellent tool where you have a scattered AGS component in the overstory. But with beech sprouts present, residual overstories need to be sparse, along the line of 20 sq ft. of BA. At 40 BA, our experience is that beech will be successful.

This will vary from site to site, and also with advance regeneration.

Just to toss out some numbers, a resid BA of 30, with average diameter of 10" will be ~60 trees per acre. Twenty years of growth will add about 4" or more to each tree, for average diameter of 14"+. This brings your BA up to over 60, near the B-line. So if you are deferring the overstory removal for 20+ years, you will be shading out your mid-tolerant regeneration: even if it gets well-established, out-competes the beech, and gets missed by the ungulates! So the basic advise, and I say this to myself every day: "Make up your mind. Are you regenerating this acre or not? If not, stay above the B-line. If you are, then do it well."

In a practical sense, I think some issues were raised about off-road vehicle access. ATV use is a problem on many of the lots we manage, and it is difficult to control. There are law-enforcement options, etc with mixed efficacy. Active harvesting is the one time that heavy equipment is available to maintain these roads, and it is a normal part of the logging process. I would suggest that close-out of the logging include barriers for access, but also

permanent waterbars that can withstand a certain amount of abuse. Horse traffic and mountain bikes have a much higher unit load on the ground than ATV's, and can do tremendous damage also. But if a cull log is placed in the top of the waterbar, especially at the beginning of the job, they hold up pretty well through the logging, and afterwards. Then, if there is illegal ATV use, resulting erosion will be greatly reduced.

The interested public, especially visitors to State land, need help in understanding the process. We have all had the occasion to show a visitor what we do. It is rewarding to them and us. The visitor sees the disturbance, and without understanding (and with 30 years of brainwashing by various media and their public schoolteachers - sorry, I had to say that.) have a negative reaction. But a brief conversation with a managing forester gives them insight that this is a controlled process, for a specific purpose. That it promotes healthy forest growth and wildlife habitat, and the wood products they use everyday without the extremity of 'rainforest destruction', vast plantations, or other real or perceived negative consequences. Since we don't get to stand there everyday and have those meetings, I have a simple, low cost suggestion. You can print up 11x17" posters on your office copier, and have them laminated for a couple bucks each. They last a year or more if they don't get peppered with birdshot. (OK, don't put them on a crop tree!) The top portion should be large print with the state logo, forestry designation, and a contact phone number. The bottom can be smaller print, and a whole paragraph detailing the forest management practices in front of them. Anyone really interested will stop and read these, and at least have a basic understanding of why this "forest disturbance" is actually a good thing. I conclude with an example paragraph:

"This forest started as abandoned farmland in 1916. Note the corner of stone walls. There are indications that it was harvested about 1970, and was purchased by the State in 1972. This portion has been designated for diverse woodland use, including the production of wood products, and diverse wildlife habitat. A forest improvement cut was done in 1992. The overstory trees are about 97 years old, and growth rates are slow, and many trees are affected by fungus or other diseases. This harvest is being done to remove the overstory trees, release saplings created in the previous harvests, and create a dense new growth of mixed hardwood that will provide food and cover for deer, grouse, songbirds and other wildlife. Sawlogs are sold for lumber for furniture and housing. Lower quality logs are sold for paper-pulp and home heating firewood. The next harvest is planned for about 2043 as the larger saplings mature, and begin to shade out the new seedlings."

Yours,  
Robbo Holleran  
Mass Forester #397

**From:** JOSEPH F CARVALHO [jcarvalho02720@msn.com]  
**Sent:** Thursday, January 10, 2013 10:40 AM  
**To:** Comments, Timber (DCR)  
**Subject:** Co-Peace S1

To the Director of Forest Stewardship:

On Saturday, January 5, 2013, I visited the 'Co-Peace S1' site currently be considered for commercial logging in the Southerastern Massachusetts Bioreserve.

After viewing the damage to that area by the illegal activity being allowed to take place on the land, I oppose any commercial logging anywhere in the Bioreserve in the strongest terms possible. Illegal activity has resulted in trees being uprooted, gullies so deep a man over six feet tall can actually stand upright in many of them. Sediments are being washed into the brook due to the erosion casused by this illegal activity and must be prohibited, with exisying laws being strictly enforced. The erosion, destruction and damage to the area and the brook on the parcel must be repaired by the agency with the responsibility for doing so, and protecting the precious land that belongs to all Massachusetts residents. To do anything less is both irresponsible and reprehensible. Restore the brook and forest NOW!

Joseph F. Carvalho  
575 Eastern Avenue  
Fall River, MA 02723  
(508) 646-3616

**From:** JOSEPH F CARVALHO [jcarvalho02720@msn.com]  
**Sent:** Thursday, January 10, 2013 10:40 AM  
**To:** Comments, Timber (DCR)  
**Subject:** FW: Co-Peace S1

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From: [jcarvalho02720@msn.com](mailto:jcarvalho02720@msn.com)  
To: [timber.comments@state.ma.us](mailto:timber.comments@state.ma.us)  
Subject: Co-Peace S1  
Date: Thu, 10 Jan 2013 10:39:45 -0500

To the Director of Forest Stewardship:

On Saturday, January 5, 2013, I visited the 'Co-Peace S1' site currently be considered for commercial logging in the Southerastern Massachusetts Bioreserve.

After viewing the damage to that area by the illegal activity being allowed to take place on the land, I oppose any commercial logging anywhere in the Bioreserve in the strongest terms possible. Illegal activity has resulted in trees being uprooted, gullies so deep a man over six feet tall can actually stand upright in many of them. Sediments are being washed into the brook due to the erosion casused by this illegal activity and must be prohibited, with exisying laws being strictly enforced. The erosion, destruction and damage to the area and the brook on the parcel must be repaired by the agency with the responsibility for doing so, and protecting the precious land that belongs to all Massachusetts residents. To do anything less is both irresponsible and reprehensible. Restore the brook and forest NOW!

Joseph F. Carvalho  
575 Eastern Avenue  
Fall River, MA 02723  
(508) 646-3616

**From:** Church, Peter (DCR)  
**Sent:** Thursday, January 10, 2013 3:26 PM  
**To:** 'Keith Argow'; Comments, Timber (DCR)  
**Cc:** [jhutchins@massforestalliance.org](mailto:jhutchins@massforestalliance.org)  
**Subject:** RE: Proposed Forest Mft. MA State Forests

Thanks for your input Keith

Peter Church  
Department of Conservation and Recreation  
Director of Forest Stewardship  
251 Causeway St.  
Boston, MA 02114  
617-626-1461

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**From:** Keith Argow [<mailto:argow@cs.net>]  
**Sent:** Wednesday, January 09, 2013 4:46 PM  
**To:** Comments, Timber (DCR)  
**Cc:** [jhutchins@massforestalliance.org](mailto:jhutchins@massforestalliance.org); Church, Peter (DCR)  
**Subject:** Proposed Forest Mft. MA State Forests

**Forests are a resilient living ecosystem. They can both benefit or be harmed by man's treatment of them. The proposed timber management programs are an example of benefiting from well thought out stewardship.**

**Increasingly private woodlands in Massachusetts are setting the standard of sustainable management of all the forest resources including clean water, natural habitat, recreation, as well as timber production that provides jobs by a factor of at least 5.**

**So should state forests exemplify the best in forest management. This will inspire more private woodlands owners with an example all are proud of.**

**We hope you will implement the proposals.**

**Keith A. Argow, PhD, CF  
President  
National Woodland Owners Association  
374 Maple Ave E, Suite 310  
Vienna, VA 22180  
703.255.2700; [argow@cs.net](mailto:argow@cs.net), [www.nwoa.net](http://www.nwoa.net)**

**From:** LOGGINGATMLC@aol.com  
**Sent:** Thursday, January 10, 2013 4:53 PM  
**To:** Comments, Timber (DCR)  
**Cc:** jhutchins@massforestalliance.org  
**Subject:** In support of MA DCR

January 10, 2013

Department of Conservation & Recreation

We are writing in support of sustainable Forest Management in the Commonwealth of Massachusetts.

A properly managed forest protects water quality, provides recreational opportunities, as well as maintaining wildlife habitat. When properly managed, the forest will provide income to the Commonwealth for generations to come.

Our small business injects \$2.5 million dollars into the local economy each year, providing forestry services to both private landowners and municipalities. Multiply this by dozens of operators throughout the region, and this equates to hundreds of decent paying jobs.

Thank you for your consideration.

Sincerely,

Lyle Brundige, President  
Monadnock Landclearing & Chipping, Inc.  
PO Box 547, Greenville NH 03048-0547  
603-878-2803 Cell: 603-533-3070  
Fax: 603-878-2329

**From:** Michael R. Banas [mb@BanasInsurance.com]  
**Sent:** Thursday, January 10, 2013 6:37 PM  
**To:** Comments, Timber (DCR)  
**Cc:** 'Michael R. Banas'  
**Subject:** DCR Forestry cuts

**Importance:** High

Hello,

My wife and I being landowners with 150 acres +/- total owned land have utilized the services of NRCS/USDA with a forestry conservation program just recently on 130 of those acres. We have learned a tremendous amount by enrolling into the program; from our NRCS case manager – Vince Snyder, a Mass Wildlife Biologist - Marianne Piche, our MA State Forester – Sean Libbey, our private forester as well as our invasive species expert.

Without the education we have gotten so far, there is absolutely no way I would feel fair in commenting on this issue.

I am by no means a forestry *expert*, however being that I grew up in the woods since young and now manage our tree farm, I feel as though I now know enough to make the following comments in regards to the proposed cuts.

- 1.) Please do the proposed cuts as prescribed by the professionals. Anyone who comments counter to the professionals does ***not*** have any education as far as forestry goes. Anyone who actually listens and/or bases a decision from an opinion from someone who is not trained in these matters is allowing malpractice of forestry – and this is certainly not for the benefit of the forests and animals.

While we were having part of our tract enhanced for oak regeneration – one of our abutters confronted us in a very non-friendly way to show her dislike for the cut. My wife asked her if she was trained in forestry – the woman answered “no”, my wife went on to say that unless you are trained kindly keep your comments to yourself. The woman then stated that she just didn’t want to see “the poor trees cut”, incidentally we removed damaged trees from ice storms, beech, poorly formed red maple to make way for the large oak trees with huge crowns to reproduce. When The State of MA forester – Sean Libbey saw this particular cut the woman was not happy with; Sean said it was one of the ***niciest*** oak regen cuts he has seen.

***With this in mind - please listen to the professionals – not the general public; they have no clue as to what they are talking about.***

Any questions please email me.

Thank you.

Mike Banas  
63 Main Street  
Easthampton, MA 01027

 Please consider the environment before printing this e-mail.

**From:** Rod Setkewich [rodsetk@gmail.com]  
**Sent:** Thursday, January 10, 2013 8:45 PM  
**To:** Comments, Timber (DCR)  
**Cc:** Jeffrey Hutchins  
**Subject:** DCR Forest Management Proposals

I have thoroughly reviewed each of the following six forest management plans:

Freetown State Forest  
Marlboro-Sudbury State Forest  
Federated Women's Clubs State Forest  
Leyden State Forest  
October Mountain State Forest  
Sandisfield State Forest

As one in favor of responsible and sustainable long-term forest management in Massachusetts, I wholeheartedly support all six excellent plans set forth by the DCR foresters. We Massachusetts residents need to work harder to grow our own forest products, rather than to obtain them from areas of the world where poor or no forest cutting regulations exist.

It is my opinion that the plans set forth for the six areas designated above demonstrate a balanced approach to management with adequate consideration of all areas of the public interest including aesthetic, recreational, timber harvest, and conservation (soil, water, air, wildlife, cultural) interests by the application of long-term sustainable management of our forests.

Please try to ensure that the products harvested from Massachusetts forests are consumed within Massachusetts.

Rod Setkewich, Chapter 61 Landowner  
Belchertown, MA

**From:** Michael Barry [mbarry@baystateforestry.com]  
**Sent:** Thursday, January 10, 2013 10:14 PM  
**To:** Comments, Timber (DCR)  
**Subject:** 6 timber harvests

I do not have comments to the specific harvesting projects that are proposed, but I do have some comments to the general policy of forest management on state lands and especially about the acceptance of public input on these projects.

I do agree that the forest land owned by the Commonwealth of Massachusetts should be managed in a very conservative way, and the management that is conducted should be conducted in a manner that is sustainable for the long term.

I also believe that the extensive resources that exist on our state lands should be utilized to benefit the local economy and to provide some revenue to the state and to the towns where these lands occur. Timber harvesting should be conducted on a more regular basis to maintain and enhance the declining forest products industry in southern New England. The state lands have an opportunity to protect the viability of this industry over the long term. While private lands make up the majority of forest lands in this region, private forest management is greatly unpredictable for volumes of product as well as for the types of products sold. Private owners often respond to the perception of market trends, rather than to what the timber markets are actually doing. State land management should be conducted in a consistent basis annually, to maintain product flow to the few local sources that are left, and to maintain activity for the local forest products harvesting operators. The state-employed staff dedicated to managing the state's timber resources should be able to pay for their own salaries and expenses, and be able to put additional revenue into the state's budget as well. If this cannot be accomplished, the role of the state as a steward of forest land should be re-examined by all of the citizens of Massachusetts.

With all of this being said, I must state that I disagree strongly with the results of the Forest Futures Visioning Process. Removing most of our state forests from land where active forest management can occur is a huge mistake, and needs to be re-considered. In many areas, most of the recreational infrastructure on the existing state forests came from timber harvesting activities, and has gradually been transferred to recreational trails due to lack of recent forest management.

As I see it, the problem lies with the politicians of this state being unwilling to allow the agency staff to conduct activities according to sound scientific principles. The public should not be making the detailed management decisions for each 50 acre parcel of state forest. The state has hired staff who are qualified to make these decisions, considering recreation, aesthetics, wildlife, long term timber production, soil and water quality and other factors.

\*\*\*The public input process needs to take place at the general concept phase of management planning. Once the statewide and district-wide goals are established, DCR staff should implement these goals on lands that are best suited for this purpose. Once these areas are identified, public input meetings should be held, but the intent of projects and the silviculture applied should not be changed unless some unknown information is provided by someone. If additional input is taken on every project, this will only water down the intended results of each project, reducing the effectiveness of the management of all state lands, and reducing the accomplishment of the goals originally created.

Please trust your employees who implement these projects, allow them to explain themselves about why they are doing each project, and defend the need for conducting this management where it is proposed.

Please keep in mind a major flaw in taking in the public's input – You will only receive the extreme point of view from each side. There are a LOT of people out there who want more harvesting on state lands, or at least who don't mind it, and most of them do not have the time or energy to be involved in this process. I have made some comments in the past regarding the forest visioning process, and I was disgusted at the lack of acknowledgement of the forest industries'

point of view in that process. Please make some changes, and allow the great potential good management of the state forest lands to be realized to some extent in the future.

Mike Barry  
Bay State Forestry Service  
Northfield, MA

**From:** James McSweeney [jim@hilltowntreeandgarden.com]  
**Sent:** Friday, January 11, 2013 8:04 AM  
**To:** Comments, Timber (DCR)  
**Subject:** i support

the DCR's sustainable management plan  
of our state forests

rock on

Jim McSweeney M.C.A, M.C.H.  
President  
Hilltown Tree & Garden LLC

---

Cell (413) 559-1905  
[www.HilltownTreeandGarden.com](http://www.HilltownTreeandGarden.com)

**From:** gregory cox [gcox@crocker.com]  
**Sent:** Friday, January 11, 2013 2:39 PM  
**To:** Comments, Timber (DCR)  
**Subject:** Comments on DCR proposed timber harvests

Good Morning:

I would like to comment in favor of the six proposed forest management projects on DCR lands.

I've read through each of the proposals, they seem to be well-thought-out and based on the applicable science and silvaculture. They also appear to adequately plan for buffers and BMPs to protect nearby wetlands or sensitive areas.

This kind of careful sustainable management is just the kind of example the state should be providing for the management of our woodlands.

Gregory Cox

13

Pond Road

Hawley, MA 01339

413 339-5526

[gcox@crocker.com](mailto:gcox@crocker.com)

**From:** O'Shea, Tom (FWE) [tom.o'shea@massmail.state.ma.us]  
**Sent:** Friday, January 11, 2013 3:48 PM  
**To:** Comments, Timber (DCR)  
**Cc:** Church, Peter (DCR); Hill, William (DCR); Cooper, Stephanie (ENV); Scanlon, John (FWE)  
**Subject:** DFW Public Comments on DCR's Proposed Harvest Projects  
**Attachments:** DFW Public Comment on DCR Proposed Harvests\_01-11-13.pdf

Peter,

Attached are the Division of Fisheries and Wildlife's general comments on all 6 of DCR's proposed harvest projects. We appreciate the opportunity to provide input as part of the public review process and look forward to future collaboration on similar projects.

Sincerely,  
Tom

**Thomas K. O'Shea**

*Assistant Director, Wildlife*

PLEASE NOTE NEW FIELD HEADQUARTERS ADDRESS (Phones and Emails have not changed.)

**Massachusetts Division of Fisheries and Wildlife**

100 Hartwell Street, Suite 230

West Boylston, MA. 01583

Tel: 508.389.6327

Fax: 508.389.7890

<http://www.mass.gov/dfwele/dfw/index.htm>



**MassWildlife**

Commonwealth of Massachusetts

# Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

January 11, 2013

Peter Church  
Director of Forest Stewardship  
Department of Conservation and Recreation  
251 Causeway Street  
Boston, MA 02114

RE: DFW Review of DCR Proposed Harvests

Dear Peter:

The Division of Fisheries and Wildlife (DFW) completed a review of six proposed timber harvests on Department of Conservation and Recreation (DCR) lands as requested. DFW appreciates the opportunity to review these proposals with respect to wildlife considerations both prior to and as part of the public review process.

These reviews are consistent with the recommendations from the Forest Futures Visioning Process to "establish a formal ongoing planning and adaptive management process for addressing habitat needs". Based on discussions with DCR, DFW understands and appreciates that DCR is seeking specific comments from DFW on both the likely impacts of the proposed harvests on wildlife and the potential for maximizing habitat attributes through harvesting at these sites.

DFW recognizes that these initial six proposals were chosen as demonstrations of good forestry practices following the recent hiatus in harvesting operations on DCR forests. To that end, DFW offers the following suggested improvements:

**1) Project Goals and Context:**

DFW offers that some improvement is needed in articulating the goals, values, context, and rationale for each of DCR's proposed harvest projects. Improvement in this regard, will not only help DFW in evaluating DCR projects, but also help the public understand the need for and impacts on other resource values. This is important in gaining public support for proposed projects.

*[www.mass.gov/masswildlife](http://www.mass.gov/masswildlife)*

**2) Forest Opening Size and SGCN Species:**

DFW recommends that DCR consider the future possibility of increasing the range of forest opening sizes beyond the currently proposed 1/3 acre. Larger opening sizes, where appropriate, would promote not only structural diversity and generalist wildlife within the forest, but also to provide habitat conditions for SGCN species, which tend to be habitat specialists that rely on extensive patches (2 ha or more) of young forest and shrublands. DFW understands that it may not be feasible to include openings of >1/3 ac in the immediate future given current DCR Management Guidelines, so in our project specific reviews, we have incorporated specific suggestions and examples of how such openings could be accomplished in subsequent entries.

**3) Ecological Communities:**

Although the projects refer to forest “stands”, there may also be opportunities to consider these areas as unique ecological communities that call for particular silvicultural methods which more closely emulate natural disturbance processes that formerly occurred in the local landscape. It may also be beneficial to point out in these proposals that the specific treatments being considered are largely in response to human alteration of natural disturbance processes (primarily flooding and fire) that formerly provided extensive patches of open habitats across the landscape.

**4) Diversity:**

All the proposed projects could benefit by more explicitly stating what diversity means and how the projects will achieve this diversity not only in the short-term, but also by describing what future treatments are anticipated as necessary.

**5) Biological Monitoring:**

Understanding what actions to take in the future and evaluating how well DCR is achieving its stated goals depends on biological monitoring, and monitoring depends on a bench mark or pre-harvest inventory. DFW is aware that information on biological monitoring is planned for inclusion in DCR’s more detailed forest management prescription, but recommends that it is important to include information on monitoring in the initial harvest proposal.

In particular, a listing of plant species occurrence and abundance in the overstory and understory at the site is recommended as this demonstrates that DCR is intimately familiar with the sites and its unique resources. Monitoring is also important with respect to understanding what impacts deer and/or moose may be having on the forest as well.

**6) Project Maps:**

The proposed harvest summaries could also be improved by incorporating a series of three maps: 1) a locus map; 2) an ortho-photo map to show the

landscape setting (the locus map could appear as an inset in the ortho-photo map); and 3) a topographic map showing existing forest stand boundaries, stream crossings, wetland areas, skid roads, and other site specific information within the proposed harvest area.

DFW is willing to assist DCR in moving forward with these demonstration projects and any future proposed harvest projects. In particular, DFW looks forward to collaborating with DCR to identify and manage appropriate areas of state forestlands for grassland, shrubland, and young forest habitat as outlined in DCR's Management Guidelines.

Again, thank you for the opportunity to comment on DCR's proposed timber harvest operations.

Sincerely,



---

Thomas K. O'Shea  
Assistant Director, Wildlife

**From:** Heidi Ricci [hricci@massaudubon.org]  
**Sent:** Friday, January 11, 2013 4:13 PM  
**To:** Comments, Timber (DCR); Church, Peter (DCR)  
**Cc:** Gregory, Paul (DCR); Regosin, Jonathan (FWE); Richards, Todd (FWE);  
jhutchins@massforestalliance.org; friend@networkingfriends.net; info@greenfutures.org  
**Subject:** Proposed Forest Management Projects on DCR Properties  
**Attachments:** 2013 timber sales Mass Audubon comments.pdf

On behalf of Mass Audubon, I submit the attached comments on the six forest cutting projects presently under review on DCR properties.

Thank you for considering these comments.

**E. Heidi Ricci**

Senior Policy Analyst

Mass Audubon

208 South Great Road

Lincoln, MA 01773

781-259-2172

[hricci@massaudubon.org](mailto:hricci@massaudubon.org)

*Shaping the Future of Your Community* Program - helping communities chart a more sustainable future -  
[www.massaudubon.org/shapingthefuture](http://www.massaudubon.org/shapingthefuture)

***Support our public policy initiatives, advocacy positions & conservation projects with over 100,000 other people by joining Mass Audubon at: [www.massaudubon.org](http://www.massaudubon.org)***

Every little bit helps. 

Please consider the environment before printing.



January 11, 2013

Peter Church  
Director of Forest Stewardship  
Massachusetts Department of Conservation and Recreation  
251 Causeway Street  
Suite 600  
Boston, MA 02114

Via Email: [Timber.Comments@state.ma.us](mailto:Timber.Comments@state.ma.us)

Re: Proposed Forest Management Projects on DCR Properties

Dear Mr. Church:

On behalf of Mass Audubon, I submit the following comments on the six Forest Management Proposals currently proposed by the Department of Conservation and Recreation (DCR). Mass Audubon actively participated in the DCR Forest Futures Visioning Process beginning in 2009 and supported the Landscape Designations in 2012. The Landscape Designations divided DCR land into three categories: Reserves, Parklands, and Woodlands. The Woodlands comprise about 39%, or 122,000 acres of DCR's Division of State Parks and Recreation lands. Woodlands are the only Landscape Designation where commercial forestry is allowed, in accordance with detailed Guidelines. The goal in Woodlands is to apply sustainable forest management practices of excellent quality that will serve as model forestry and to provide high quality forest products while protecting natural resource values and functions. The six forestry projects presently under review are the first projects proposed under the new land management system.

Mass Audubon supports DCR moving forward with implementation of the Woodlands aspect of the Landscape Designations. We appreciate the fact that DCR is pursuing a limited number of projects, geographically dispersed across the state, and with an expanded public input and planning process. The success of these initial projects in achieving high quality forestry outcomes on the ground is vital to increasing public understanding of and support for forestry on public and private lands.

### **General Comments**

In general, the projects appear to have been selected in a manner consistent with the Guidelines. Several of the sites have conditions that may be improved through forest management, such as plantations in poor condition, sites with extensive damage from the 2008 ice storm or tree diseases or pests, and locations where management has occurred in the past and additional forestry can demonstrate techniques for further development of diverse multi-aged stands.

The initial proposals are relatively brief and general. More detailed silvicultural prescriptions will be written for the projects following consideration of public input and site visits. Mass Audubon recommends that the detailed plans include specific plans for restoration and permanent closure of illegal Off Highway Vehicle (OHV) trails

where they currently exist on the properties. The detailed plans should also include plans for management of invasive species before, during, and after the forestry operations, particularly for the sites (e.g. Sudbury-Marlborough State Forest) where the property is located within a landscape where invasive plant species are prevalent. It is important that the disturbances created by forestry operations do not either facilitate additional illegal OHV activity (e.g. on skid trails) nor promote the spread of invasive species.

Mass Audubon has not had the opportunity to review 5 of the 6 sites on the ground; therefore comments are for the most part general and based on the written descriptions. We urge DCR to carefully consider any comments submitted by citizens or groups familiar with specific sites. Mass Audubon is submitting detailed comments below on the Freetown Co-Peace Stand 1 Forest Management Project in the Freetown State Forest. This site is located within the Southeast Massachusetts Bioreserve, which is a unique designation deserving special attention. The comments below detail concerns in relation to the previously established goals and management plan for the Bioreserve, notably severe damage from illegal OHV activity. Priscilla Chapman, Mass Audubon's Taunton Watershed Advocate, visited the site on December 4 and these comments are based on direct observations of site conditions.

**Invasive Species:** Invasive plants are a problem in many locations across Massachusetts. Invasive plants are non-native species that have aggressive growth characteristics which tend to crowd out native vegetation. In some cases, invasive vines such as Oriental Bittersweet climb and smother trees. Invasive species of shrubs and herbaceous species can create dense stands that prevent native species from regenerating. Many invasive species tend to become established easily on disturbed soils and in locations where light availability is increased, such as openings created by tree removal operations. Invasive species are most prevalent in suburban landscapes as well as some areas historically used for agriculture, but they can occur in more remote locations as well. It is important that the detailed silvicultural plans for each site include pre-treatment for any invasives that already exist on the site; provisions for preventing spread of invasives onto the site during forest cutting (e.g. sanitation of equipment entering the site); and follow-up monitoring and control on all sites following the forestry operation.

**Damage from Illegal OHV Activities:** Several of the sites also have existing recreational impacts of concern, notably damage to soils and vegetation by illegal Off-Highway Vehicle (OHV) activity. Mass Audubon has worked extensively with DCR on the issue of illegal OHV activity for many years. We worked hard to support the passage of Chapter 202 of the Acts of 2010 which strengthened OHV oversight and enforcement tools. Priscilla Chapman represents Mass Audubon on the statewide OHV Advisory Committee. DCR, in coordination with the Environmental Police, has been working to curtail illegal OHV activity and associated damage on state lands. Nonetheless, the scope of this problem far exceeds the agencies' capacity to manage it. We will continue to support funding for enforcement, education, and provision of safe, legal trails for OHVs.

**Freetown Co-Peace Stand 1 – Extensive OHV Damage:** One of the sites proposed for a Forest Management Project is "Freetown Co-Peace, Stand 1," a 17-acre area in the Freetown-Fall River State Forest. As the Notice indicated, the State Forest is part of the 14,000-acre Southeastern Massachusetts Bioreserve, established in 2002 by a Memorandum of Understanding (MOU) between several partners: the Executive Office of Environmental Affairs, the Department of Environmental Management (now DCR), the Division of Fisheries and Wildlife, the City of Fall River, the Fall River Redevelopment Authority and The Trustees of Reservations. The MOU stated that the parties entered the agreement in order to "acquire, protect and preserve a large ecosystem of statewide interest and to maintain, restore and enhance its biological diversity and integrity." The establishment of the Bioreserve also included the largest ever disposition of state-owned Article 97 land, with 300 acres of the State Forest transferred to the Fall River Redevelopment Authority for development of the Fall River Executive Park. Mass Audubon supported the establishment of the Bioreserve, as the net resulting conservation exceeded by an order of magnitude the loss of Article 97 lands.

A Management Plan for the Bioreserve was adopted by the MOU partners in 2003 which stated that the Bioreserve would be managed to "ensure the long-term health of the natural resources" and permanently protect

“an area of core habitat large enough to sustain natural processes.” The parties agreed that the area would be managed for multiple uses, including forestry, water supply protection, recreation and interpretive and educational programs in addition to natural resource protection, while ensuring “that recreational and other activities are compatible with ecological biodiversity goals.” The Plan also included a commitment to “maintain, restore and enhance natural hydrological systems.” It is important that any forestry operations within the Bioreserve carefully follow the Management Plan as well as the statewide forestry Guidelines.

Stand 1 is located immediately east of Rattlesnake Brook, a 2.7 mile cold-water stream that once supported native brook trout. The Management Plan identified Rattlesnake Brook as the only stream in the Bioreserve that supports recreational fishing. Efforts are underway to remove a downstream impoundment to restore anadromous fish passage. DCR’s Public Notice for the forestry project notes: “Just west of the stand the slope increases considerably as it falls toward the brook.” Illegal operation of off-highway vehicles in and around the “Stand 1” area has resulted in extensive damage that includes many deep ruts and trenches (up to 6’ or more in depth) cut into the slope and extending down to the brook. The soils are sandy and highly erodible. In addition to the damage to the slope, there are significant amounts of eroded sediment, gravel and rocks that have been transported into the brook itself, diverting streamflow in at least one location. On the far side of the brook, a muddy “plowed up” area marked with tire tracks appeared to indicate frequent stream crossing by vehicles. Fresh tire tracks in several areas indicate at least some of the damage is recent.

DCR’s proposal for Stand 1 acknowledges the illegal OHV use and the large quantity of sediment eroding into the brook, and states, “In-kind services may perhaps be used to lessen the amount of erosion and provide for a joint rehabilitation project with local motorcycle users.” Specific plans for this rehabilitation work, as well as commitments to ongoing enforcement, are needed.

At DCR’s public meeting at Fall River Heritage State Park on the evening of December 4, 2012, Ms. Chapman described what she had observed and expressed concern that timber cutting in an area of unstable and highly damaged slopes might result in additional erosion and degradation of water quality and aquatic habitat in the brook. She asked DCR to give top priority to repairing the damage and identifying ways to curtail illegal OHV use. DCR staff indicated that the proposed forestry operation would result in closing off illegal trails and might result in some remediation of the environmental damage.

The Bioreserve Management Plan acknowledged past illegal use of trails by motorbike riders in environmentally sensitive areas and identified Guidelines for managing motor bike use. These included: conducting annual reviews of use of motorized trail bikes in the Forest, noting and reporting infractions, developing an annual permit system to control use and establishing monitoring points in the Forest and other areas of the Bioreserve. The Plan recommended that managers “assess erosion impacts to Rattlesnake Brook and other wetland resource areas. Work with motorbike riders to mitigate any impacts. If mitigation is not possible or does not reduce impacts, relocate motorbike trails.” Overall, the Plan established a high standard for stewardship of ecological resources in the Bioreserve. This standard should be incorporated into Forest Management Projects proposed in the State Forest. It should also be noted that it appears that the damage at the site has been made by both motorbikes and 4-wheel ATVs; the latter are not allowed on this property at all. Enforcement activities should be directed to both excluding ATVs from the property and limiting motorbikes to approved trails.

We commend DCR for acknowledging the erosion in the Stand 1 area, but believe that a stronger and more substantial response is needed, consistent with objectives and guidelines for the Bioreserve set forth in the Management Plan. The severe damage to slopes and extensive sedimentation in Rattlesnake Brook require immediate attention, prior to the commencement of any timber cutting. We urge DCR to develop a detailed plan for full repair of the rutted areas, stabilization and revegetation of slopes and other disturbed areas, removal of sediment from the brook and restoration of unrestricted flow, to be implemented before forestry activities begin. Forestry-related skid trails may be susceptible to access by illegal OHVs, and the silvicultural prescription needs to specifically address how that will be prevented. In addition, we are concerned that new signage and gating may

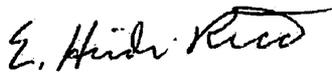
not be adequate to control illegal OHV activity, and urge DCR to initiate vigorous and ongoing enforcement efforts, including “sting” operations and issuance of citations and fines as allowed by Chapter 202 of the Acts of 2010 and its regulations. We request further clarification of the selection of this particular site within the context of the overall property and the stated rationale and objectives on page 1 of the Freetown State Forest cutting proposal, and at a minimum, that you defer the “Freetown Co-Peace Stand 1” project until significant progress has been made in ecological restoration and curtailment of illegal trail use.

**Conclusion**

Mass Audubon strongly supports the Forest Futures Visioning Process, the Landscape Designations, and implementation including sustainable forestry operations within Woodlands. We recommend that the detailed silvicultural plans for these projects include site-specific plans for management of invasive species and OHVs, tailored to the local site conditions. The existing OHV damage at Freetown State Forest is extensive and has damaged a sensitive cold-water fishery. This particular site requires special attention, including further evaluation of whether forestry is the best mechanism for addressing existing and ongoing OHV damage. We thank DCR for enhancing the public input process for forestry projects, and encourage careful consideration of all comments by members of the public who are familiar with specific sites as well as more general comments.

Thank you for considering our comments, and for all your efforts to promote ecologically-based and sustainable forest management.

Sincerely,



E. Heidi Ricci  
Senior Policy Analyst

cc: Paul Gregory, DCR  
Jon Regosin, NHESP  
Todd Richards, MassWildlife Fisheries Biologist  
Massachusetts Forests and Parks Friends Network  
Jeff Hutchins, Massachusetts Forest Alliance  
Green Futures, Fall River

**From:** Andrew D. Finton [afinton@TNC.ORG]  
**Sent:** Friday, January 11, 2013 4:35 PM  
**To:** Comments, Timber (DCR); Lambert, Ed (DCR)  
**Cc:** Sullivan, Rick (EEA); Cooper, Stephanie (ENV); OConnor, Robert (EEA); Church, Peter (DCR); Wayne Klockner; Silva, Jason (DCR)  
**Subject:** The Nature Conservancy's comments on six Forest Management Proposals  
**Attachments:** DCR Forest Management Proposals\_TNC comments\_1-11-13.pdf

Dear Commissioner Lambert,

On behalf of The Nature Conservancy, thank you for the opportunity to comment on DCR's Forest Management Proposals (comments attached), and thank you for your conservation leadership.

Andy Finton

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**Andy Finton**

*Director of Science and Conservation* **The Nature Conservancy**  
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Commissioner Edward M. Lambert, Jr.  
Department of Conservation and Recreation  
251 Causeway St.  
Boston, Massachusetts 02114

January 11, 2013

**Re: DCR Timber Harvest Proposals**

Dear Commissioner Lambert,

On behalf of The Nature Conservancy, please accept our comments on the Department of Conservation and Recreation's six Forest Management Proposals. The Conservancy is a leading conservation organization working around the world to protect ecologically important lands and waters for nature and people. The Conservancy and its members have protected over 22,000 acres of habitat in Massachusetts.

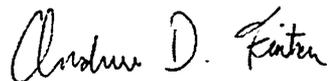
Massachusetts is blessed with nearly 3,000,000 acres of forest covering approximately 60% of the state. These forests provide invaluable benefits to MA citizens and visitors. These benefits include the provision of clean water, absorbing greenhouse gases and improving air quality, supporting numerous recreation opportunities from hiking and bird watching to hunting, supporting wildlife and forest biodiversity, and providing sustainable forest products. The 2010 DCR Forest Futures Vision and subsequent 2012 Landscape Designations and Management Guidelines were well designed to maximize the provision of these important benefits through the designation and management of Forest Reserves, Woodlands, and Parklands. These laudable achievements truly represent a paradigm shift that will propel Massachusetts to the forefront of effective land management. These initiatives were rigorous, science-based, and objective. The Landscape Designation and Management Guidelines report is a credible and thorough approach to categorization and management of DCR lands. The Nature Conservancy commends DCR for developing the Forest Vision and Landscape Designations, facilitating a robust stakeholder process, and for adopting and implementing key recommendations.

Actively managed DCR Woodlands complement DCR Forest Reserves and Parklands. Sustainably managed woodlands, both public and private, are a key component of providing the forest benefits listed above. The six forest management proposals represent the spirit and intent of the DCR Forest Vision and Landscape Designations. And these varied projects are in keeping with DCR's Management Guidelines for Woodlands. These six projects set the stage for ongoing DCR forest

management following best management practices and supporting local forest products. Forest management on DCR forests is an important part of the Massachusetts forest economy providing jobs, supporting Massachusetts businesses, and providing state and local tax revenue. These and subsequent timber harvests also represents an opportunity to begin a concerted outreach and education process to inform Massachusetts citizens of the value of forests and the role of active management. We encourage DCR to take advantage of this opportunity.

The Nature Conservancy supports the implementation of the six Forest Management Proposals. The sustainable management of DCR Woodlands, as represented by these six proposals, represents a key component of the implementation phase of the DCR Forest Vision. We appreciate the allocation of scarce resources to these efforts and support continued emphasis on both holistic forest management and proactive forest land protection. The Nature Conservancy continues to advocate for state operating budget funds and the capital investments required for DCR to realize its goals. The Forest Management Proposals, as a key piece of the DCR Forest Vision, will serve the citizens of Massachusetts, and our natural resource base, for generations to come. Thank you for the opportunity to comment.

Sincerely,



Andrew D. Finton  
Director of Science and Conservation  
The Nature Conservancy's Massachusetts Chapter

Cc:

Richard Sullivan, Secretary, EOEEA  
Jason Silva, Chief of Staff, DCR  
Peter Church, Director of Forest Stewardship, DCR  
Stephanie Cooper, Assistant Secretary for Land and Forest Conservation, EOEEA  
Bob O'Connor, Director of Land and Forest Conservation, EOEEA  
Wayne Klockner, MA State Director, TNC

# Green Futures

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*"Citizen action for better communities."*

Director of Forest Stewardship  
Massachusetts Department of Conservation and Recreation  
251 Causeway Street  
Suite 600  
Boston, MA 02114

January 9, 2013

Dear Director of Forest Stewardship,

After a number of meetings and much discussion and research Green Futures strongly opposes the "timber harvest" planned for "Co-Peace 1" and "Co-Peace 2" in the Southeastern Massachusetts Bioreserve (SMB).

We are hugely disappointed that DCR's Bureau of Forestry and Fire Control (BFFC) fails to realize that the SMB is not just another state property where timber harvest and prescribed burns have been done in the past, so it is okay to do them now. The SMB is unique, created and dedicated as a bioreserve. It has its own management plan. DCR is a signatory to that plan.

We have the same problem with BFFC's timber harvest program that we have with BFFC's "prescribed burn" plan for DCR land in the SMB. Once again, when we asked, no one could explain what species, native to the Bioreserve, prescribed burns were supposed to preserve or enhance.

The areas BFFC picked to burn were areas that had already been mechanically cleared and chipped of all trees after the alien gypsy and winter moth devastation of eight or nine years ago. Due to the recent mechanical clear-cutting these SMB areas are functioning ecologically as early successional forest for species that require that type of habitat. One of these already cleared areas slated for a "prescribed burn" is one of the few areas where the Bioreserve's dwindling box turtles can be found and all the mechanically cleared areas, slated for burning, host nesting whip-poor-wills, towhees, catbirds, prairie and chestnut-sided warblers, etc.

Just like with logging, we are not opposed to fire management if it is done for species specific purposes. We are opposed to prescribed burning in the SMB when it is done primarily for training purposes or just because lighting and managing controlled fire is an exciting and macho thing to do and, "because we've been trained to do it."

It is telling, we think, that “prescribed fire” burning in the SMB suddenly became “something that just had to be done” ...despite the fact it had never been done before ...after BFFC received \$1.7 million dollars of US Recovery Act “stimulus” money.

The question we would like to see answered is, if BFFC wants to conduct prescribed burns/fire management in the SMB, which SMB species will it benefit, which SMB species will it not benefit, and how does the fire plan fit into long-range plans for the SMB as a whole?

Amazingly, right after the poorly conceived prescribed burn proposal comes two timber harvest proposals, “Co-Peace 1” and “Co-Peace 2.” Once again, BFFC ignores the SMB management plan.

It appears to us and others that have visited the sites, that “Co-Peace 1” and “Co-Peace 2” were just picked at random. Did someone just close their eyes and point to two spots on the map? Does some local logging outfit need some pine logs to mill? Were these parcels chosen because timber cutting activities will hide illegal off-road vehicle damage that DCR has allowed to occur? We don't know. Like the “prescribed fire” proposal no one has yet explained how “Co-Peace 1” and “Co-Peace 2” fit into a long range plan for timber cutting in the SMB as a whole.

What part of “bioreserve” isn't understood by DCR forestry personnel? Logging can enhance biodiversity, logging can also diminish biodiversity. Once again, the SMB came with a comprehensive management plan. DCR's poorly conceived logging plans, as written, are not in the best interest of the SMB

It is apparent that DCR's Bureau of Forestry is still stuck in an earlier era when few questioned where, when or how public land was logged. One would think, after all the recent controversy over logging on public lands in Massachusetts, DCR's approach would have changed. Although DCR may not have changed, times have changed and although slowed by a poor economy sprawl development continues across Massachusetts and more and more people care about THEIR open space lands and the animals and plants that call those lands “home.”

The reason the SMB was created was because southeastern Massachusetts was disappearing under a tsunami of development. And, I must add a personal comment here; ...I find it very disappointing ...when questioning a member of your department about the benefits and detriments to the flora and fauna of an extractive resource plan he is pursuing ...and I'm expecting a thoughtful answer ...and instead I'm brushed off with, “Oh, don't worry, the deer will thrive on all the new growth.” Everyone is **not** a deer hunter!

In Bristol County I'm not “worried” about the deer. I am worried about the demise of all our wood turtles, all our black rat snakes, almost all of our box turtles, almost all of our bobwhite quail and ruffed grouse and whip-poor-wills, our native brook trout, our marbled salamanders, our snowshoe hares, our giant Saturniid moths, etc., etc. etc.

Check out Mass Audubon's' “Losing Ground” report, [http://www.massaudubon.org/losingground/fast\\_facts.php](http://www.massaudubon.org/losingground/fast_facts.php) for more on land development and native species loss.

When it comes to logging our public lands, no longer does, “one size fit all” ...and especially when proposing to cut timber on land set-aside and dedicated as a bioreserve.

Once again, what exactly is the problem at BFFC? Is everyone there just “itching” to get back to “business as usual” now that the timber cutting moratorium has ended? Why the rush?

Are folks in that DCR department so "old school" that they can't find ways ...or arrogantly won't find ways ...to responsibly log under a slightly more different kind of management plan?

The other SMB Partners seem to understand the important role this open space parcel plays in encouraging and maintaining native plant and animal species in this rapidly urbanizing region. Too bad DCR's BFFC is reluctant to join them in this important work.

Please make our comments part of the official record.

Thank you.

Tim Bennett, President

Cc - Southeastern Massachusetts Bioreserve Partners:

Massachusetts Executive Office of Energy and Environmental Affairs  
Massachusetts Division of State Parks and Recreation  
Massachusetts Division of Fish and Wildlife  
City of Fall River, Superintendent of Watershed Protection  
The Trustees of Reservations



January 11, 2013

Peter Church, Director of Forest Stewardship  
Massachusetts Department of Conservation and Recreation  
251 Causeway Street, Suite 600  
Boston, MA 02114

Dear Director Church,

The Massachusetts Forest and Park Friends Network shares the concerns of Green Futures regarding the proposed timber sale in the Southeastern Massachusetts Bioreserve (SMB). The Department of Conservation and Recreation (DCR) Commissioner Lambert recently expressed his and the DCR's commitment to the SMB as preserving "the functionality of a large-scale ecosystem and promotes biodiversity, conservation, water supply protection, sustainable forest management and scientific, educational and recreational opportunities...reaffirm[ing] the Administration's commitment to the protection of land for public open spaces, conservation, rare species habitat and recreation. \*

The Forest Management Proposal for the Freetown Co-peace timber sale fails to explain how the timber harvest will benefit the SMB, which, as the Department of Fish and Game Commissioner Griffin notes, "is home to a great diversity of wildlife, with ten rare species including the bald eagle, marbled salamander, Eastern box turtle, and Plymouth gentian. It is also a great recreational resource for people who enjoy the outdoors."\*

Allowing timber harvesting in a bio reserve may benefit companies who conduct timber harvesting and want access to timber on public lands but on public land, especially public land acquired as a bio reserve, the DCR must show how timber harvesting to assure multi-aged silvicultural systems, supports the overall objectives of the SMB. Timber harvesting to demonstrate a two age silvicultural system is better done on a property where "Woodlands" is the primary designation rather than on a property whose primary designation is a bio reserve. Unless a strong case can be made for benefitting the forest in a bio reserve, a forest demonstration site is simply not the best use of lands set aside in the SMB.

We appreciate that the DCR is concerned about the damage that illegal off-road vehicle (OHV) use is causing at Freetown Fall River State Forest. While there is mention of the possibility of using the timber sale revenue and contractual requirements to repair damage, specific information about how that would happen is absent. The DCR

proposal fails to discuss the greater likelihood that harvested areas, if not the entire SMB, may be subject to greater illegal use once the area is perceived as more important as a woodlot than as a reserve. What's just as disconcerting is that there are no provisions for, or consideration of, monitoring illegal use or of the need for increased enforcement once staging areas and access roads are cut within the forest.

The Forest Management Proposal does not mention, nor does it provide, measures for the protection of the harvested area from the increased potential for invasive plants that are more likely to invade disturbed areas. Protection against invasive plants must be part of every timber-harvesting proposal.

DCR has provided a good case for the proposed timber sale, other than to create a source of income for private timber interests. The DCR needs to do a better job of describing how timber harvests "reaffirm the Administration's commitment to the protection of land for public open spaces, conservation, rare species habitat and recreation, as stated by Commissioner Lambert in May 2012, and how the timber harvest supports the "public-private sector partnerships by DCR, DFG, TTOR and the City of Fall River... to preserve the functionality of a large-scale eco-system and promote biodiversity, conservation, water supply protection, sustainable forest management, and scientific, educational, and recreational opportunities."\*

For the above reasons, we respectfully ask that the Freetown Co-peace Forest Management Proposal be withdrawn until the management objectives and goals for the SMB are clarified and consistent with the primary and higher purpose of the property as a bio reserve.

Sincerely,

Sharl Heller  
For the Massachusetts Forest and Park Friends Network

\*The Official Website of the Executive Office of Energy and Environmental Affairs (<http://www.mass.gov/eea/pr-2012/120504-pr-se-ma-bioreserve-land.html>). *Patrick-Murray Administration Announces Southeastern Massachusetts Bioreserve Land Acquisitions. Acquisitions mark 10-year anniversary.*