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

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**RE: Comments on Seven DCR Proposed Forest Management Projects**

Dear Ms. Rowcroft,

We are writing to comment on seven forest management projects that are being proposed by the Massachusetts Department of Conservation and Recreation (DCR) in seven state forests.<sup>1</sup> The projects include Brett Road (Beartown State Forest), Norway Spruce Removal I Pine Barrens Restoration (Myles Standish State Forest), Washington Mountain Norway Spruce Removal (October Mountain State Forest), Shear Pin Sale (Savoy State Forest), Hadley-Aiken - Partial Overstory Removal (Templeton State Forest), Barker Hill Lot (Townsend State Forest), and Two Cubs Timber Sale (Windsor State Forest).

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

We are concerned that these claims are either questionable or not supported by the facts. Therefore, we protest all seven of these logging projects.

**Carbon Sequestration**

**DCR claim:** Logging will “sequester carbon in retained overstory trees, permanent forest products produced from the harvest, and in the vigorous regenerating forest.”

**Response:** DCR acknowledges scientific studies, which have found that uncut forests sequester more carbon than logged forests.<sup>2</sup> While any retained trees will, of course, sequester some carbon, the proposed logging project would result in significantly less carbon sequestration than if the forest were simply allowed to grow. This is especially important in Massachusetts, which has some of the most carbon-dense forests in the Northeastern United States that also have a large potential for future growth.<sup>3</sup>

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<sup>1</sup> Department of Conservation and Recreation. 2019. DCR Announces Public Meetings for Forest Management Projects in Savoy, October Mountain, Windsor, Beartown, Templeton, Townsend and Myles Standish State Forests. Commonwealth of Massachusetts  
<https://www.mass.gov/files/documents/2019/03/18/Forest%20Management%20Projects%20-%20Bureau%20of%20Forestry%20Notice%20March%202019.pdf>

<sup>2</sup> Jared S. Nunery and William S. Keeton. 2010. Forest Carbon Storage in the Northeastern United States: Effects of Harvesting Frequency and Intensity Including Wood Products, Forest Ecology and Management, Volume 259, Issue 8, 31 March 2010. pp. 1363 1375)  
[http://www.uvm.edu/gjee/pubpdfs/Nunery\\_2010\\_Forest\\_Ecology\\_and\\_Management.pdf](http://www.uvm.edu/gjee/pubpdfs/Nunery_2010_Forest_Ecology_and_Management.pdf)

<sup>3</sup> P. Van Deusen and L.S. Heath. 2010. COLE Map Northeast. COLE Web Applications Suite. NCASI and USDA Forest Service, Northern Research Station. Available only on internet  
[http://www.ncasi2.org/COLE/maps/labCOLE\\_NorthCentral.png](http://www.ncasi2.org/COLE/maps/labCOLE_NorthCentral.png)

Likewise, although some carbon may be sequestered in forest products, this would be far less than if the forest were left standing. Studies have shown that even considering conversion to wood products, most of the original carbon in a logged forest will be released to the atmosphere within a few weeks or months.<sup>4</sup>

Finally, while a young forest recovering from logging will sequester carbon, the amount will be less than if the existing trees were allowed to grow. Recent studies show that forests increase the rate of carbon sequestration as they age.<sup>5</sup> By cutting many, if not all, mature trees, the proposed logging projects would release massive amounts of carbon and set back the amount of new carbon sequestration for decades. Furthermore, logging can cause a gradual release of carbon from soils that lasts for decades after the logging is complete.<sup>6</sup>

The 2008 Massachusetts Global Warming Solutions Act (GWSA) called for dramatic reductions in greenhouse gas emissions beginning in 2020. The 2018 report of the UN Intergovernmental Panel on Climate Change (IPCC) warned that we need to dramatically address climate change by 2030, including not only reducing greenhouse gas emissions from energy production, but also absorbing and storing carbon from the atmosphere — with forests playing a critical role.<sup>7</sup> In 2019, Governor Baker reaffirmed a commitment with 24 other governors in the U.S. Climate Alliance to the goal of sequestering more carbon in forests as a way to mitigate climate change.<sup>8</sup> The logging projects considered here are inconsistent with this growing consensus.

### **“Sustainable” Production for the Local Economy**

**DCR claim:** Logging will provide for “sustainable production” of “locally grown products for the locally grown forest products to the local economy.”

**Response:** There is no agreed-upon scientific definition of “sustainable” forestry. DCR’s own management guidelines state that, “Sustainable forest management [is an] evolving concept [which] has several definitions.”<sup>9</sup> The contribution of this logging to the “local forest products industry” is highly dubious, since the agency acknowledges that more than 80% of logs cut on

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<sup>4</sup> John Talberth, Dominick DellaSala, and Erik Fernandez. 2015. Clearcutting our Carbon Accounts: How State and Private Forest Practices are Subverting Oregon’s Climate Agenda. Center for Sustainable Economy and GEOS Institute. November 2015 <http://sustainable-economy.org/wp-content/uploads/2015/11/Clearcutting-our-Carbon-Accounts-Final-11-16.pdf> and Ann L. Ingerson. 2009. Wood Products and Carbon Storage: Can Increased Production Help Solve the Climate Crisis? The Wilderness Society, Washington, DC.

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

<sup>5</sup> N. L. Stephenson, A. J. Das, R. Condit, S. E. Russo et al. 2014. Rate of Tree Carbon Accumulation Increases Continuously with Tree Size. *Nature*: doi:10.1038/nature12914 (2014). <http://www.nature.com/nature/journal/vaop/ncurrent/abs/nature12914.html>

<sup>6</sup> Chelsea L. Petrenko and Andrew J. Friedland. 2014. Mineral Soil Carbon Pool Responses to Forest Clearing in Northeastern Hardwood Forests. *GCB Bioenergy* (2014), doi: 10.1111/gcbb.12221. <http://onlinelibrary.wiley.com/doi/10.1111/gcbb.12221/abstract>

<sup>7</sup> Intergovernmental Panel on Climate Change. 2018. Global Warming of 1.5° C: Summary for Policymakers

[https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_version\\_stand\\_alone\\_LR.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf)

<sup>8</sup> United States Climate Alliance. 2019. Natural and Working Lands <https://www.usclimatealliance.org/nwlands>

<sup>9</sup> Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines, p. 59 <https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf>

state lands are shipped out of state for processing. Moreover, timber values are so low that local towns receive only a few thousand dollars as their share of revenue from these sales.

### **Liquidation of Plantations**

**DCR Claim:** Red pine and Norway spruce plantations need to be removed because they are “declining due to fungus, insects, disease, wind damage, or overcrowding, or are susceptible to these factors.” This will also allow the “release” of native species in the understory and promote the restoration of native forest ecosystems.

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

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

Perhaps the greatest cost is that cutting down plantations will worsen climate change. As noted above, this will release most of the carbon in the trees, and a significant amount soil carbon, into the atmosphere. On the other hand, studies indicate that if these trees were left alone, even after they die they would continue to store most of their carbon for decades, releasing it slowly and gradually.<sup>10</sup> This is especially important because as the IPCC warns, minimizing carbon emissions over the next decade is critical if we are to avoid catastrophic climate change.

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

**DCR Claim:** The logging proposals claim that cutting down trees is needed as a “treatment” for fungus, insect infestations, and disease. This includes the “salvage” of white ash “before its imminent mortality from the Emerald Ash Borer.”

**Response:** Insects and disease are a natural part of healthy forest ecosystems. They help decompose and recycle nutrients, build soils, maintain genetic diversity within tree species, and provide homes and food for wildlife. There is little evidence to support the assumption by foresters that logging will reduce insects and disease.<sup>11</sup>

Emerging studies find that cutting down trees to “save” the forest from insects and disease actually makes the “problem” worse. For example, a biological analysis done by Acadia National Park, where logging is prohibited, found that logging elsewhere does not appear to

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<sup>10</sup> David J. P. Moore, Nicole A. Trahan, Phil Wilkes, et al. 2013. Persistent Reduced Ecosystem Respiration After Insect Disturbance in High Elevation Forests. *Ecology Letters*, (2013) 16: 731–737 doi: 10.1111/ele.12097 <http://onlinelibrary.wiley.com/doi/10.1111/ele.12097/abstract>

<sup>11</sup> Scott Hoffman Black. 2005. Logging to Control Insects: The Science and Myths Behind Managing Forest Insect “Pests.” A Synthesis of Independently Reviewed Research. The Xerces Society for Invertebrate Conservation, Portland, OR [https://www.xerces.org/wp-content/uploads/2008/10/logging\\_to\\_control\\_insects1.pdf](https://www.xerces.org/wp-content/uploads/2008/10/logging_to_control_insects1.pdf)

have prevented the spread of the red pine scale. Moreover, it was found that moving trimmed or harvested materials in spring through fall had the potential to actually spread the insect.<sup>12</sup>

There is also increasing evidence that logging reduces the natural resistance of a forest to insects and disease. In one study, researchers found that after “thinning” of forest plots, 50% of the trees’ genetic diversity had been lost. Of particular concern was the loss of rare alleles, which plants and animals rely upon to deal with new challenges.<sup>13</sup> An annual inventory by the U.S. Forest Service found that, despite an outbreak of the emerald ash borer that killed most ash trees, some trees persisted, and offered options for breeding or reforestation.<sup>14</sup> “Salvaging” (cutting down) ash trees that have not been infected would cause the loss of trees that could potentially have resistant genes that could be critical in restoring the forest.

### “Diversification” of Even-aged Forests

**DCR Claim:** Because “the harvest area is even aged, and is at a point in maturity appropriate to introducing a [sic] new age classes...logging will...increase biological and structural diversity.” This will “improve wildlife habitat, specifically browse and cover through the introduction of new age classes and increasing species diversity.”

**Response:** “Age class” is a forestry construct, not an ecological description. It derives from the timber industry approach of logging a stand of trees in intervals of several decades, leaving a forest made up of several “age classes.” A natural forest has no “age classes,” but is made up of trees in an age continuum from seedling to old growth.

Many of our state forest lands have “even-age” stands because of past logging using the industrial forestry approach. DCR would have us believe that more of the same will “increase biological and structural diversity.” In fact, this will lead to a never-ending series of logging incursions every few years, which will perpetuate a forest with trees that abruptly jump in age several decades between them. This is not what a natural forest would do.

What DCR calls “improving” wildlife habitat, “specifically browse and cover,” is called “forest fragmentation” by biologists. There is no objective evidence that creating more forest openings will “increase species diversity.” In fact, the Massachusetts Division of Fisheries and Wildlife’s BioMap2 report provides strong evidence that the opposite is true. This report states:

“Forest interior habitat is widely recognized as critically important for species sensitive to forest fragmentation and is becoming increasingly scarce in highly populated regions of the country like Massachusetts... Many bird species that breed in Massachusetts are sensitive to forest fragmentation, including Ovenbirds, Scarlet Tanagers, and many woodland warblers. Negative results of fragmentation include edge effects such as nest predation by

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<sup>12</sup> Acadia National Park. 2014. Invasive Insect Contributing to Red Pine Die-off on Mount Desert Island. National Park Service <https://www.nps.gov/acad/learn/news/invasive-insect-contributing-to-red-pine-die-off-on-mount-desert-island.htm> )

<sup>13</sup> Diana L. Six, Eric Biber, and Elisabeth Long. 2014. Review Management for Mountain Pine Beetle Outbreak Suppression: Does Relevant Science Support Current Policy? *Forests* 2014, 5, 103-133; doi:10.3390/f5010103 forestsISSN 1999-4907 [https://www.researchgate.net/publication/259714120\\_Management\\_for\\_Mountain\\_Pine\\_Beetle\\_Outbreak\\_Suppression\\_Does\\_Relevant\\_Science\\_Support\\_Current\\_Policy](https://www.researchgate.net/publication/259714120_Management_for_Mountain_Pine_Beetle_Outbreak_Suppression_Does_Relevant_Science_Support_Current_Policy)

<sup>14</sup> Jennifer L. Koch, Mary E. Mason, David W. Carey, Kathleen Knight, Therese Poland, and Daniel A. Herms. 2010. Survey for Tolerance to Emerald Ash Borer within North American Ash Species in Proceedings of the Symposium on Ash in North America. U.S. Forest Service Forest Service, Northern Research Station. General Technical Report NRS-P-72 [https://www.fs.fed.us/nrs/pubs/gtr/gtr\\_nrs-p-72r.pdf](https://www.fs.fed.us/nrs/pubs/gtr/gtr_nrs-p-72r.pdf)

species associated with development such as skunks, raccoons, and house cats; and nest parasitism by species such as the Brown-headed Cowbird that lay their eggs in the nests of other bird species and reduce their reproductive success. Forest interior habitats also support a wide range of native plants, animals, and ecological processes sensitive to other edge effects such as noise and light pollution from roads and development, invasive species establishment, and alterations to wind, heat, and other climate variables.”<sup>15</sup>

If left alone, so-called “even-aged” forest tracts will evolve on their own to diverse, multi-aged forests. Efforts by foresters to “help” this process along will set back recovery and open the forest to invasive species, the spread of insects and disease, desiccation and increased fire risk, the and loss of interior forest wildlife. DCR’s logging proposals fail to take these concerns into account.

### **Logging in Parklands and Reserves**

**DCR Claim:** Logging is needed in areas designated as “Parkland” and “Reserve” to remove trees dying from insects and disease, to “release” understory trees, and to “remove hazards to infrastructure and human safety.” Oak hardwood stands in the Parkland area “will also be treated with a commercial thinning system to remove stressed trees and to retain and promote high vigor trees. The primary goal of the treatment will be to promote a more diverse and complex forest structure of variable tree sizes.”

**Response:** According to 2012 DCR Management Guidelines:

Reserves” “conserve large contiguous blocks of high-value ecosystems.... Forest management will generally consist of letting natural processes take their course....

Parklands conserve unique natural and cultural resources while focusing on the provision of recreation....<sup>16</sup>

These guidelines allow exceptions if it is determined that special circumstances require cutting of trees. However, the understanding from the DCR’s Forest Futures Process, which led to these guidelines, was that there is a high burden of proof on DCR to log in Parklands and Reserves.

DCR is planning significant logging operations in the Parkland and Reserve areas of Beartown State Forest. However, DCR’s claim that it needs to log for “hazards to infrastructure and human safety” are the same as those used for a logging proposal for Robinson State Park more than a decade ago. The proposed Robinson logging was supposedly to remove trees that were dying from insects and disease and to protect the public from trees falling along roadsides and buildings. The excuse then, as now with the Beartown proposed logging, was that it was too expensive to hire an arborist to selectively cut only hazard trees. Instead, DCR proposes industrial forestry operations that would include loggers with skidders and harvesters, which would cause significant damage to the forest and to public recreational use.

The Robinson State Park logging proposal met with massive public opposition. Citizen research showed that the rationales for the logging were not based on any objective science.

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<sup>15</sup> Natural Heritage Endangered Species Program. 2010. Forest Core BioMap2 Components. Core Habitat: Forest Core Critical Natural Landscape: NA. Massachusetts Division of Fisheries & Wildlife. <http://www.mass.gov/eea/docs/dfg/nhesp/land-protection-and-management/forest-core.pdf>

<sup>16</sup> Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines <https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf>

After months of controversy, this ill-considered logging proposal was withdrawn. The proposal to log in Beartown State Forest Parkland and Reserve areas needs to be withdrawn and revised as a focused, low-impact project that carefully removes only trees that threaten public safety.

The proposed cutting of oak stands in the Beartown State Forest Parkland is even less justified. This would be nothing more than converting a natural forest into an industrial timberland. This natural forest does not need “treatment” to make it more diverse and complex. On the contrary, logging will simplify and degrade native ecosystems. There is no evidence that this logging operation meets the standards of DCR’s guidelines, or that it is anything more than a commercial timber sale under the guise of “improving” the health of the forest.

### “Recruitment” of Sugar Maples

**DCR Claim:** Logging is needed to “increase the distribution and relative density of sugar maple to combat sugar maple decline.” “Thinning will be used to remove other hardwoods...in small areas where no sugar maple are present, or...undesirable, openings of 1/3 acre or smaller will be installed in order to begin the process of regeneration, and hopefully recruit more sugar maple. [T]he desired future condition is for these stands to continue to be sugar maple dominant with a diverse groundcover.”

**Response:** DCR acknowledges that, “Natural stands dominated by sugar maple are not common in Massachusetts.” Yet, one of the goals of the Savoy State Forest logging project is to artificially create such sugar maple-dominated stands. This will be done by cutting down naturally occurring native tree species, such as white ash, red maple, yellow birch, white birch, American beech, and black cherry, and with small clearcuts to create forest openings.

There are at least four serious problems with this plan.

- Sugar maple decline is a generalized set of symptoms of trees suffering a wide range of different stressors and DCR provides no scientific evidence to show how this logging operation will address the issue.<sup>17</sup>
- Because this tract has apparently not been logged for decades, with trees that are 80 years old or more, the logging project would release significant amounts of carbon and set back carbon sequestration for decades in the future.
- This tract provides valuable interior forest habitat that would be fragmented by the creation of artificial openings.
- The DCR approach of logging forest where there are now no sugar maples with the goal of “hopefully recruiting” more sugar maples is highly questionable, considering the major downsides listed above.

### “Restoration” Logging

**DCR Claim:** Logging is needed to “complete an ecological restoration of open pitch pine (*Pinus rigida*) and scrub oak (*Quercus ilicifolia*) communities, which are often referred to as

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<sup>17</sup> David R. Houston. 1999. History of Sugar Maple Decline un: Horsley, Stephen B.; Long, Robert P., eds. Sugar maple ecology and health: proceedings of an international symposium; 1998 June 2-4; Warren, PA. Gen. Tech. Rep. NE-261. Radnor, PA: U.S. Department of Agriculture, Forest Service, Northeastern Research Station: 19-26. <https://www.fs.usda.gov/treearch/pubs/13134>

'Pine Barrens'" in Myles Standish State Forest. "Humans have worked to "to exclude fire in these pine barrens areas over the past half-century" and "many plantations of exotic softwood trees were established on former pine barrens habitat or are adjacent to existing pine barrens. Therefore, "removal" of "non-native plantation[s]" which "are generally low in species diversity" "is a high priority."

**Response:** Myles Standish State Forest encompasses "globally rare natural communities, including the third largest Pine Barrens in the world, and numerous coastal plain ponds harboring unique plants and wildlife."<sup>18</sup> As with almost all of Massachusetts, this has been significantly altered by human resource exploitation. The goal of ensuring the recovery and protection of this important ecosystem is an important one.

We are concerned that the Myles Standish State Forest Norway Spruce Removal / Pine Barrens Restoration project would hinder, rather than promote ecological restoration. The plantation trees will gradually die and fall down, allowing native species to reclaim the landscape. Logging them only speeds up the process, and this comes at a serious cost. Cutting down plantations would release almost all of the carbon in the trees to the atmosphere, because the plan is to remove whole trees and chip them. This will worsen climate change. The disruption and radical alteration of this plantation liquidation would also increase the likelihood further invasive species incursions, insect infestations, and disease.

According to DCR, Myles Standish State Forest is "the largest public recreation area located in the densely populated southeastern Massachusetts," welcoming over 600,000 visitors per year.<sup>19</sup> DCR notes that, "as whole tree removal will occur, the resulting landscape will have a dramatic change in appearance as large clearings will be created." These "clearings" are otherwise known as clearcuts, and the public rightly finds such logging ugly and repellant. It would take many years for the clearcut areas to return to a relatively natural-appearing state.

The DCR logging proposal does not provide any site-specific information on what species of special concern require the cutting of plantations to survive or thrive. Detail is not available from the 2011 Resource Management Plan, which provides generic information across the entire landscape. This leaves us with no on-the-ground data showing scientifically proven benefits to specific rare or imperiled plants and wildlife on specific sites. Without this critical information, and knowing the likely negative impacts of logging, we oppose this project.

The rationales offered by DCR for these seven proposed logging projects raise serious questions and concerns. The agency has not provided scientific evidence to support any of its planned logging operations. Therefore, we protest all of the projects and urge DCR to withdraw them for further consideration and public review and comment.

We also object to the unreasonably short period for public comment on these logging proposals. The need to review and comment on seven individual logging projects is an undue burden for most citizens. This will severely limit the ability of most people to provide a detailed assessment and preclude many people from commenting at all. We urge DCR to extend the comment another 30 days to May 29, 2019.

Thank you for the opportunity to comment on these seven forest management projects. We look forward to your timely response.

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<sup>18</sup> Massachusetts Department of Conservation and Recreation. 2011. Myles Standish Planning Unit Resource Management Plan, Including Myles Standish State Forest. (p. i)  
<http://www.friendsmssf.com/rmp/rmp-mssf.pdf>

<sup>19</sup> Ibid.

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