Submitted via email

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TO: Jessica Rowcroft
Massachusetts Department of Conservation and Recreation
DA: January 5, 2025
RE: **Comments on Ten Forestry Project Proposals for Fiscal Year 2026**

Dear Ms. Rowcroft:

We are writing to comment on ten forest management projects that are being proposed by the Massachusetts Department of Conservation and Recreation (DCR).[1]

Five are in areas designated as “Woodlands”; “Center Brook” (Savoy Mountain State Forest), “Two Cubs” (Windsor State Forest), “Burrow Pit (October Mountain State Forest), “Almost Halfway “ (Granville State Forest), and “Brookline Road 2.0” (Townsend State Forest), totaling 265.5 acres.

Four are in areas designated as “Parklands”: “Echo Lake Project” (Wachusett Mountain State Reservation), “Granby Sand Plains” (Holyoke Range State Park Acres), “Stoddards Field Restoration” (Willard Brook State Forest), and "Fire adapted ecosystems, Chicopee” (Chicopee Memorial State Park) totaling 326.1 acres.

One is in an area designated as a “Reserve”: “Myles Standish State Forest Restoration and Fuels Reduction Buffer” (Myles Standish State Forest) totaling 32 acres.

DCR has issued an individual proposal for each logging project. These proposals include a number of claims regarding the purported benefits of logging, most of them presented in more than one project plan.

There may be some legitimate need for some of these logging activities, such as the removal of hazard trees. However, we are concerned that in most cases the claimed benefits of these logging projects are either questionable or not supported by the facts.

[1] Department of Conservation and Recreation. (2025). Forest Management Projects https://www.mass.gov/guides/forest-management-projects#-forest-management-projects-proposed-2025-

FOREST MANAGEMENT IN PARKLANDS AND RESERVES (FIVE PROPOSALS)

The five proposals need to include explanations regarding how they meet the *Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines (March 2012).* (2012 DCR Management Guidelines).

According to these 2012 DCR Management Guidelines[2]:

> *Reserves "conserve large contiguous blocks of high-value ecosystem…. Forest management will generally consist of letting natural processes take their course…. In general, removal of trees and other vegetation (including commercial or salvage harvests) will not be allowed in Reserves. However, some situations may call for ecological restoration and vegetation management. Situations where some management may be appropriate include the removal of invasive species or for the protection of existing rare species. Fire adapted Reserves in Southeastern Massachusetts may require active restoration and management to maintain habitat for rare species and reduce the risk of catastrophic wildfire that can threaten human health and safety".* (p. 3-4)
>
> *Parklands "conserve unique natural and cultural resources while focusing on the provision of recreation" [and allow for] "Vegetation management necessary to comply with NHESP recommendations for the restoration and maintenance or enhancement of habitats for rare and endangered species…."* (p. 4)

Three of the five proposals are located in "Natural Heritage Polygons." The "Priority Habitats of Rare Species" data layer contains polygons representing the geographic extent of habitat of state-listed rare species in Massachusetts. These polygons do not necessarily represent locations of endangered species.[3]

As noted above, management priorities for Parklands allow vegetation management for "restoration and maintenance or enhancement of habitats for rare and endangered species." The Echo Lake and the Stoddard Fields projects are not located in "Natural Heritage Polygons." Therefore, DCR cannot and does not claim that these management plans meet a threshold of necessity for Parkland vegetation management. For this reason, these projects should not go forward.

For the three projects that are in "Natural Heritage Polygons," if the goal was to protect "rare species" or "endangered species," DCR should provide solid evidence that there are such species present on the ground in these project areas and that the proposed activity would provide habitat that is needed by specific rare or endangered species to survive and thrive in their natural range. This must include a list of such species, as

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[2] 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

[3] MassWildlife (2026). Natural Heritage GIS Resources. https://www.mass.gov/info-details/natural-heritage-gis-resources

documented by site-specific surveys and inventories. DCR has not provided evidence of substantive surveys, inventories, or analysis to support claims that these projects will help rare or endangered species.

Impacts on Air Quality

We oppose the project in Chicopee Memorial State Forest for a number of reasons, but in particular, "prescribed" burning. Open burning, even if "prescribed," is prohibited in Chicopee:

> *"No such open burning shall apply to commercial or institutional land clearing for non-agricultural purposes."*

These prescribed burns should not occur near homes in the first place and not in the City, as regulated under Massachusetts 310 CMR 7.00: Air pollution control.[4]

Under 310 CMR 7.07(3)(e):

> *"Open burning…shall not be permitted in the Cities and Towns of Arlington, Belmont, Boston, Brookline, Cambridge, Chelsea, Chicopee, Everett, Fall River, Holyoke, Lawrence, Lowell, Malden, Medford, New Bedford, Newton, Somerville, Springfield, Waltham, Watertown, West Springfield, and Worcester, or where the Department has notified a city or town that*
>
> *1. open burning under this provision may cause or contribute to non-attainment of federal or state ambient air quality standards for particulate matter,*
>
> *2. open burning under this provision may cause or contribute to a condition of air pollution, or*
>
> *3. open burning under this provision is not permitted due to continued violations of the provisions for the proper conduct of such open burning."*

Although prescribed burning is allowed on qualified agricultural lands, the management proposal for Chicopee does not meet the statutory definition of "agriculture," as it relates to forest land, which is: "the growing and harvesting of forest products."[5] Instead, the DCR proposal for Chicopee prescribes burning for wildlife habitat, ecological restoration, and other purposes that do not include "harvesting of forest products."

This project is not qualified under local Chicopee ordinances regarding open burning and it does not merit an exception under the legal definition of "agriculture." Therefore,

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[4] Massachusetts Department of Environmental Protection 310 CMR 7:07 (3) Open Burning. https://www.mass.gov/regulations/310-CMR-700-air-pollution-control-0

[5] Title XIX, Chapter 128, Section 1A: Farming, agriculture, farmer; definitions. https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIX/Chapter128/Section1A

the proposed Chicopee Memorial State Forest management project should be canceled.

The management proposal for the Myles Standish State Forest Reserve is also highly questionable. The stated purpose of the project is:

> *"Establishing and/or maintaining fuel/fire breaks. Fuel breaks are relatively open areas where some trees are removed and flammable understory vegetation is mowed/mulched, in order to reduce fire intensity and allow prescribed fire management to proceed safely and provide a defensible space to manage fire."*

This is in an area with a history of extensive cutting and prescribed burning for "pine barrens habitat restoration" and for "fire prevention," and this project is intended to support those efforts. We have commented extensively in the past about our concerns related to these management practices in general, and in Myles Standish State Forest in particular, and remain firmly opposed to logging in this "Reserve." We find no substantial evidence that these practices are necessary or effective. On the contrary, there is substantial evidence that they are harmful to native ecosystems, climate stability, and public health.

Claimed Purposes of Prescribed Burning

All four "Parklands" proposals call for "prescribed" burning by deliberately setting areas on fire. The stated purposes of such burning include:

- To maintain a condition for the purpose of wildlife habitat in a fire-influenced natural community.
- To prevent or control excessive vegetation density negatively impacts the habitat quality of the natural community.
- To prevent or control fuel buildup may eventually lead to unplanned, catastrophic wildfire. To manipulate structure and composition to reduce the risk of wildfire. To increase fuel reduction treatments in the wildland-urban interface.
- For habitat restoration and maintenance to create heathlands, shrublands, or grassland.
- To manipulate structure and composition to reduce the risk of wildfire. Increase fuel reduction treatments in the wildland-urban interface.

Reducing Wildfire Risk

The reduction of the risk of wildfires that may endanger residences and communities is a legitimate goal for public land managers. However, the predominant strategy —

"thinning" (logging) and burning of forests — is based on scientifically questionable assumptions regarding wildfire and wildfire mitigation.

A recent, large-scale analysis confirmed that logged forests tend to have more intense fires than unlogged forests that are supposedly "overgrown" with "fuel"[6] Another exhaustive analysis, which reviewed of wildfires in the United States from 1992 to 2012, found that 84% of these wildfires were started by humans, either accidentally or on purpose.[7]

This indicates that the most effective strategy for reducing the risk of wildfires, may be to prohibit or carefully regulate the use of fire by campers and residents of the surrounding areas, and fire-harden houses and other structures in proximity to these proposed management areas, rather than logging the surrounding forest.

Creation of Heathlands, Shrublands, or Grasslands

DCR claims that it is restoring "native ecosystems" with prescribed fires, clearcutting, and other intensive logging, which are proposed for these projects. However, there is ample evidence that the native ecosystems of Massachusetts before 1600 were dominated by dense, old-growth forests with a closed canopy.[8][9] There were limited open areas, largely where there were cliffs and scree slopes, ridge tops, wetlands, beaver meadows, avalanche tracks, river margins, pond and lake margins, and coastline bluffs.

Natural disturbances such as hurricanes and tornadoes, ice storms, insect infestations and disease, beaver impoundments, and fires also caused forest openings. However, these did not cover a significant portion of the landscape of New England.[10] Moreover, these openings did not at all resemble a clearcut. Instead, they were a chaotic jumble of dead and damaged, downed wood, tip-ups, downed log dams in streams and water bodies, and snags and downed logs in forests. The ground was shaded by surviving

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[6] Bradley, Curtis M., Chad T. Hanson, and Dominick A. DellaSala. (2016). Does Increased Forest Protection Correspond to Higher Fire Severity in Frequent-Fire Forests of the Western United States? Ecosphere 7(10):e01492. 10.1002/ecs2.1492 https://doi.org/10.1002/ecs2.1492

[7] Balch, Jennifer K., Bethany A. Bradley, John T. Abatzoglou, R. Chelsea Nagy, Emily J. Fusco, and Adam L. Mahood. (2017). Human-started wildfires expand the fire niche across the United States. PNAS March 14, 2017 114 (11) 2946-2951. https://doi.org/10.1073/pnas.1617394114

[8] Foster, David R., Glenn Motzkin, Debra Bernardos, and James Cardoza. (2002). Wildlife Dynamics in the Changing New England Landscape. Journal of Biogeography, 29, 1337–1357 https://pdfs.semanticscholar.org/56d4/afbb6a1b80b25fae122ba80885d6fe240448.pdf

[9] Oswald, W. Wyatt, David R. Foster, Bryan N. Shuman, Elizabeth S. Chilton, Dianna L. Doucette, and Deena L. Duranleau. (2020). Conservation Implications of Limited Native American Impacts in Pre-contact New England. Nat Sustain 3, 241–246 (2020). https://doi.org/10.1038/s41893-019-0466-0

[10] Lorimer, Craig G. and Alan S. White. (2003). Scale and Frequency of Natural Disturbances in the Northeastern US: Implications for Early Successional Forest Habitats and Regional Age Distributions. Forest Ecology and Management 185 (2003) 41–64. https://www.sciencedirect.com/science/article/abs/pii/S0378112703002457

and rapidly recovering trees. There was no bare ground or scarified soil and nothing was removed.[111213]

Before 1600, the plants DCR is focusing on for "restoration" lived in these extreme and rare sites.[14] Today, DCR is attempting to reconstruct the human-created landscape of the mid-1800s to early 1900s, when most of the forest had been cleared and early-successional habitat was common on abandoned farms and other areas that were left alone. During this period, populations of early-successional species exploded, only to begin returning to their natural levels in recent years.[151617]

There may be a few places where intensive logging to "restore" a habitat is appropriate. In terms of these five projects, the information provided is inadequate to judge the question of whether there are other less-intrusive alternatives.[18] The issue of intensive human intervention to create early-successional habitats needs far more scientific research, fact-based analysis, and public involvement than has thus far been provided by DCR.

Whether or not there is some potential benefit to ongoing human intervention to "restore" early successional habitats, including heathlands, scrublands, or grasslands, it is dubious to assume this strategy is feasible in the long term. Maintaining these early successional habitat habitats requires clearcutting or other intensive clearing of each

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[11] Foster, David, Frederick Swanson, John Aber, Ingrid Burke, Nicholas Brokaw, David Tilman, and Alan Knapp. (2003). The Importance of Land-Use Legacies to Ecology and Conservation. BioScience, Volume 53, Issue 1, January 2003, Pages 77–88. https://doi.org/10.1641/0006-3568(2003)053[0077:TIOLUL]2.0.CO;2

[12] Cooper-Ellis, Sarah, David R. Foster, Gary Carlton, and Ann Lezberg. (1999). Forest Response to Catastrophic Wind: Results from an Experimental Hurricane. Ecology 80 (8) 2683-2696 http://www.jstor.org/stable/177250

[13] D'Amato, Anthony W., David A Orwig, David R Foster, Audrey Barker Plotkin, Peter K Schoonmaker, and Maggie R Wagner. (2017). Long-term structural and biomass dynamics of virgin Tsuga canadensis-Pinus strobus forests after hurricane disturbance. Ecology 98(3):721-733. https://doi.org/10.1002/ecy.1684

[14] Marks, P.L. (1983). On the Origin of the Field Plants of the Northeastern United States. The American Naturalist, Vol. 122, No. 2 pp. 210-228. http://www.jstor.org/stable/2461231

[15] Foster, David R. (1995). Land-Use History and Four Hundred Years of Vegetation Change in New England. In: Turner, B. L., Sal, A. G., Bernaldez, F. G., DiCastri, F., Global Land Use Change: a Perspective from the Columbian Encounter, SCOPE Publication, Consejo Superior de Investigaciones Cientificas, Madrid. https://harvardforest1.fas.harvard.edu/publications/pdfs/Foster_GlobalLandUseChange_Chapter_10.pdf

[16] Foster, David R., Glenn Motzkin, Debra Bernardos, and James Cardoza. (2002). Wildlife Dynamics in the Changing New England Landscape. Journal of Biogeography, 29, 1337–1357 https://pdfs.semanticscholar.org/56d4/afbb6a1b80b25fae122ba80885d6fe240448.pdf

[17] Thompson J.R., Carpenter D.N., Cogbill C.V., Foster D.R. (2013). Four Centuries of Change in Northeastern United States Forests. PLoS ONE 8(9): e72540. https://doi.org/10.1371/journal.pone.0072540

[18] DCR. (2011). Myles Standish Planning Unit Resource Management Plan. https://www.mass.gov/files/documents/2016/08/xc/rmp-mssf.pdf

site as often as every 10-12 years, a significant undertaking.[19] This requires a permanent, never-ending commitment to logging, mulching, mowing, herbiciding, and burning over large areas.

This kind of intensive habitat manipulation is very expensive to maintain in terms of personnel, equipment and facilities, and fossil fuel consumption. There is a very real possibility that after the current surge of early-successional habitat logging projects, there will be inadequate funds for "treatments" to maintain the open habitat in the future. This would leave a fragmented and degraded landscape that is less, not more, biodiverse. DCR provides no information on how it can ensure that this intensive logging, mowing and burning program can be continued indefinitely.

MANAGEMENT PRESCRIPTIONS COMMON TO THESE PROPOSED PROJECTS

- **The creation of early successional habitat** to create conditions favorable to wildlife dependent on this habitat type (e.g. bats, American kestrel) and because grasslands and early successional habitat types are invaluable to many species in decline that favor this forest type for part or most of their life cycle.

- **Uneven-age silviculture** to diversify species composition and increase stand structure (as discussed above, this is not a legitimate for such management in Parklands).

- **Plantation removal** with the goal of mitigating mortality within the softwood plantation and adjacent forest stands to increase forest resiliency and recreational safety.

Early Successional Habitat and Uneven–age Silviculture

Early successional habitat (ESH) is included in a strategy for logging a stand of trees in intervals of several decades, leaving a forest made up of several "age classes," one of them being ESH. 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, including the projects areas proposed here, have so-called "even-age" stands because of past logging using the industrial forestry approach. DCR would have us believe that more of the same human engineering is required to "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.

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[19] DeGraaf, Richard M. and Yamasaki, Mariko. (2003). Options for Managing Early-Successional Forest and Shrubland Bird Habitats in the Northeastern United States. Forest Ecology and Management. 185:179-191. https://www.nrs.fs.fed.us/pubs/6765

What DCR calls “improving” wildlife habitat is called “forest fragmentation” by biologists. There is no objective evidence that creating more forest openings and maintaining clearings will “increase species diversity.” In fact, the Massachusetts Division of Fisheries and Wildlife (MassWildlife) 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 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.”*[20]

If left alone, “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.

Plantation Removal

The rationale for “plantation removals” (i.e., clearcutting red pine, white pine, Scots pine, and Norway spruce plantations) is that they need to be liquidated because their health and vigor have been declining steadily, and are at high risk of mortality, or they suffer from other ailments. Depending on the particular plantation, the list of disorders includes fungus, insects, disease, wind damage, overcrowding, or “growth stagnation.”

The plantations targeted for logging tend to be about 85 to 100 years of age. In many cases these plantations have already been thinned by previous logging or through natural mortality and disturbances. In most cases, 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.

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[20] Natural Heritage Endangered Species Program. (2010). Forest Core BioMap2 Components. Core Habitat: Forest Core Critical Natural Landscape: NA. Massachusetts Division of Fisheries & Wildlife. https://web.archive.org/web/20170318051606/http://www.mass.gov/eea/docs/dfg/nhesp/land-protection-and-management/forest-core.pdf

As proposed, logging healthy trees in plantations to "salvage" their commercial value before they die comes at a significant cost to the forest. Removing these trees causes major disturbance of forest ecosystems due to fragmentation of interior forest, scarification of soils, and degradation of water and air quality. It can also increase susceptibility to invasive species, spread harmful insects and disease, and worsen the risk of fire. In addition, it removes dead trees that provide vital habitat for numerous birds and other species.[21]

One of the greatest costs of liquidating plantations is that it will worsen climate change. Cutting down these trees will release most of their carbon, along with a significant amount soil carbon, into the atmosphere within a relatively short period of time. 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.[22] This is especially important because, as the Intergovernmental Panel on Climate Change (IPCC) warns, minimizing carbon emissions over the next decade is critical if we are to avoid catastrophic climate change.[23] One of the most important strategies for accomplishing this goal is through proforestation — allowing recovering, previously cleared forests to continue growing and accumulating stores of carbon.[24]

We do not object to the appropriate use of tree removal where it is shown to be necessary for public health and safety purposes. The DCR project proposals claim that commercial logging is justified for the sake of "public safety" or "to restore ecologically significant communities." However, the agency does not provide any substantive evidence to support this claim.

Existing plantations develop ecological complexity that DCR seems to make little effort to assess. What we do know is that cutting and removing trees disrupts this balance,

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[21] Thorn, Simon, Sebastian Seibold, Alexandro B. Leverkus, Thomas Michler, Jörg Müller, Reed F. Noss, Nigel Stork, Sebastian Vogel, and David B. Lindenmayer. (2020). The living dead: acknowledging life after tree death to stop forest degradation Front Ecol Environ. https://doi.org/10.1002/fee.2252

[22] Moore, David J. P., 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

[23] Intergovernmental Panel on Climate Change (2018). "Summary for Policymakers," in Global warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C Above Pre-Industrial Levels and Related Global Greenhouse Gas Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change, Sustainable Development, and Efforts to Eradicate Poverty, eds V. Masson-Delmotte, P. Zhai, H. O. Pörtner, D. Roberts, J. Skea, P. R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J. B. R. Matthews, Y. Chen, X. Zhou, M. I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield. (Geneva: World Meteorological Society). Available online at: https://www.ipcc.ch/sr15/

[24] Moomaw, William R., Masino, Susan A., Faison, Edward K. (2019). Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. Frontiers in Forests and Global Change, Volume 2. DOI=10.3389/ffgc.2019.00027 https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2019.00027

leading to a loss of resiliency and stability just when these things are most needed to resist the impacts of climate disruption and the loss of biodiversity that is underway.

We do not believe that the project proposals and management strategies have been justified as reasons to pursue these projects in the Parklands and the Reserve.

Proposed Plantation Removals in the Woodlands Proposals

DCR proposes the liquidation of plantations in five projects in "Woodland" areas. As noted above, these plantations will undergo conversion to native species over time through natural succession, without human intervention. This does not include the many downsides of active management, which include fragmentation of interior habitats, damage to soils, release of carbon, and degradation of air and water quality.

Irregular Shelterwood and Silviculture in the Woodlands Proposals

These management strategies are purportedly for "Variable Density Thinning Gaps" expanded to encourage the regeneration process. Outside of these gaps, we are told that trees will be variably "thinned" (logged) to remove "low vigor," "low quality trees" from the standpoint of commercial forestry, and "promote growth" of the "residual forest." "Select snags" (i.e., dead trees) will be retained for wildlife and carbon storage. Remaining living trees will supposedly have an improved ability to withstand stressors, provide mast and habitat for wildlife, and provide a seed bank for the future.

There is no demonstrated need to manage forests for health or improved resilience and biodiversity. In one study, researchers found that after "thinning" of forest plots, 50% of the genetic diversity of the trees of that species had been lost. Of particular concern was the loss of rare alleles, which plants and animals rely upon to deal with new challenges.[25]

CONCLUSION

These logging proposals are the first to be released since the Healey Administration placed a moratorium on logging on state lands in 2023 order to evaluate the impacts of forestry practices on climate change. The subsequent *Report of the Climate Forestry Committee* (CFC) concluded, among other things that:

> *"Unsurprisingly, disturbing the forests of Massachusetts as little as possible and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health*." (p. 4)[26]

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[25] Six, Diana L., 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

[26] Executive Office of Energy and Environmental Affairs (2024). Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines. https://www.mass.gov/doc/forest-as-climate-solutions-climate-forestry-committee-report-final/download

We are opposing all ten of the proposed logging projects in their current form. We contend that DCR has not adequately taken into consideration the recommendations of the CFC and has not provided substantive scientific evidence to support such a dramatic divergence from this report by a group of experts appointed by the Healy administration. We believe that the people of Massachusetts want their publicly owned forests to be left uncut and intact, similar to most of our current reserve areas.

We want our public forests to recover their old-growth characteristics, once again providing habitat for the full range of native plants and wildlife, with an ecological balance determined by natural processes, not by human manipulation based on a limited and biased understanding of the natural world.

We believe that our public forests should be preserved as nature sanctuaries for the health and well-being of all the people of Massachusetts, not as “working” timberlands that benefit the few. This is how DCR should provide stewardship of our state-owned forest lands for the greatest public good.

Accordingly, we recommend that DCR cancel these ten logging projects.

You can reach Michael Kellett of RESTORE: The North Woods with a response or questions at kellett@restore.org or 978-392-0404.

Sincerely,

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