

TO: Massachusetts Department of Conservation and Recreation

RE: Comments on DCR Forest Management Projects Proposed for 2022

DA: November 1, 2022

We write to submit our comments on the proposed Department of Conservation and Recreation (DCR) forest management projects in ten state forests: October Mountain, Bryant/Berkshire Snow Basin, Warwick, Savoy Mountain, Otis, Sandisfield, Dubuque, Myles Standish, Manuel Correllus, and Townsend. (<https://www.mass.gov/guides/forest-management-projects#-forest-management-projects-proposed-2022->)

We have commented extensively in the past on DCR's forest management plans, and have objected to cutting in our state forests for the purposes of: a) carbon capture and storage, b) treatment for insects and disease, c) fire prevention, d) ecosystem restoration, e) liquidation of plantations, f) improvement of wildlife habitat, g) improvement of recreational experiences, h) sustainable wood products, i) diversification of even-aged forests, and j) forest restoration. We note that these goals of DCR are included in one or more of the 2022 proposed projects. We have attached comments for the past three years for reference, explaining our objections.

We continue to object to these reasons for forest management on state land for the reasons we have expressed in the past.

On the other hand, DCR's 2012 Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines includes guidelines for Reserves that are generally reasonable and offer protection and management that is more in line with public sentiment and independent scientific research. This includes oversight provided by the Forest Reserves Scientific Advisory Council (FRSAC), consisting of conservation biologists and forest ecology experts, to assist and review management and major restoration activities within Reserves. Those guidelines define and outline management actions allowed in Reserves, per the excerpts below. (<https://archives.lib.state.ma.us/bitstream/handle/2452/200210/ocn816519530.pdf>):

2.1 Reserves – Purpose [p. 15]

The primary purpose of setting aside large areas of forest as Reserves is to allow forests to develop relatively unimpeded by human disturbance and to create late successional habitat. Given a sufficient amount of time without major disturbances, the forest will develop characteristics associated with true old growth forest. These late successional and old growth conditions include a wide diversity of tree sizes and ages, tip-up mound topography, and micro-site conditions from fallen trees and large amounts of downed woody debris....

2.3 Management Approach for Reserves [p. 16-17]

The dominant ecosystem service objectives in Reserves will be:

- *biodiversity expansion, including complex forest systems*
- *carbon sequestration*
- *provision of wilderness recreation opportunities*

Management of Reserves should allow natural processes to determine the long-term structure, composition, function and dynamics of the forest to the maximum extent possible.

[Management Priorities in Reserves] [p. 3-4]

Reserves will conserve large contiguous blocks of high-value ecosystems.... There will be no commercial harvesting of timber in Reserves.

Silviculture and Vegetation Management Guidelines: [p. 22]

A. Habitat manipulation, silvicultural treatments and commercial harvesting operations are not permitted in Reserves. However, if deemed appropriate by DCR and reviewed by the FRSAC, the following exceptions may be allowed:

- a) Implementation of NHESP recommendations to restore, maintain or enhance habitat for rare and endangered species and exemplary natural or rare communities.*
- b) Removing plantations would not be permitted except to restore important wildlife habitat such as pitch pine barrens or other habitats and after consultation with DFW and FRSAC.*
- c) Removing non-native invasive species may occur after consultation with FRSAC.*
- d) Managing vegetation to control erosion, or to stabilize soils.*
- e) Cutting of vegetation to maintain established public vistas and trails is permitted (e.g., the small Spruce Mountain vista located in Monroe State Forest).*
- f) Removal of hazardous trees directly adjacent to official DCR trails and abutting properties that pose significant risk to public safety.*
- g) Vegetation management is permitted by parties who have secured pre-existing rights (e.g., easement holders, utility easements) to perform such activity, subject, however, to standard regulatory and permitting requirements.*
- h) Cutting vegetation to maintain existing agricultural fields or existing wildlife habitat openings is permitted.*

B. Creation of new fields, vistas and wildlife openings is prohibited.

We request that all of the 2022 DCR Forest Management proposals be limited to activities allowed in Reserves, under the review and guidance of the FRSAC, as specified in the 2012 DCR Selection Criteria and Management Guidelines (cited above). We also request that DCR designate all of the lands encompassed by these management proposals as new Reserves as soon as possible.

In addition, we request that the public remain informed and engaged in management proposals on all DCR properties.

Thank you for the opportunity to comment on these forest management proposals.

Sincerely,

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