



## Massachusetts Association of Conservation Commissions

*protecting wetlands, open space and biological diversity through education and advocacy*

February 22, 2010

DCR Forest Futures Visioning Process Comments  
c/o MODR  
University of MA Boston  
100 Morrissey Boulevard, M-1-627  
Boston, MA 02125

Via Email: [MODRDCRFFVP@umb.edu](mailto:MODRDCRFFVP@umb.edu)

Re: **Forest Futures Vision Process - Draft Recommendations of the Technical Steering Committee**

Dear Technical Steering Committee:

On behalf of the Massachusetts Association of Conservation Commissions (MACC), I submit the following comments on the draft recommendations in the Forest Futures Vision Process report. MACC represents the 2,400 Conservation Commissioners in the 351 cities and towns of the Commonwealth, who are charged with protecting the natural resources of their communities under the Conservation Commission Act (G.L. Ch.40 sec.8c) and with administering and enforcing the Massachusetts Wetlands Protection Act (G.L. Ch.131 sec.40). MACC is the voice of municipal conservation commissions across Massachusetts and our mission is to promote strong, workable, science-based laws, regulations, and policies regarding wetlands, other water resources, open space, and biological resources.

The Forest Futures Vision Process was initiated in response to public concerns regarding forest management plans and practices on state park and recreation lands under the care and control of the Department of Conservation and Recreation (DCR). MACC thanks DCR Commissioner Richard Sullivan and the DCR Stewardship Council for undertaking this public review process.

Although Massachusetts is a small state, it has over a half million acres of public parks and forests, bought with taxpayers' money or donated for recreation, protection of our air and water, wildlife habitat, and timber production. Many of these lands were protected with the assistance and support of local conservation commissions and private land trusts. These lands are under increasing pressure from a wide variety of uses as well as environmental stresses.

### **Increase Reserves and Parklands to 80%**

MACC supports many of the recommendations in the draft report. In particular, it supports a shift in the management approach to allocation of a much greater percentage of the DCR lands to large and small forest reserves and creation of a new category of land for parklands. MACC urges that the upper limit for combined reserves/parkland allocations be increased to 80% in the final report. As presented by several experts and in technical papers presented to the Technical

Steering Committee (TSC) during this process, large forest reserves are important to protect many of the vital ecosystem service values of forests, including habitat for the full range of native forest-dependent plants and animals and maximization of carbon sequestration which is vital to address climate change. Public lands provide the best, in fact in many instances the only, opportunity to protect large reserves representing the full range of ecoregional forest types found in Massachusetts. MACC also supports designating many properties across the state as parklands. At present, only the metropolitan Boston area has an Urban Parks system managed for recreational and ecological values, where no timber harvesting takes place.

The draft report calls for 100,000 to 150,000 acres out of the 308,000 acres within DCR's Divisions of State Parks and Recreation and Urban Parks to be devoted to woodland use, where active timber extraction will continue to be allowed. The report indicates that the primary purpose of these lands will be to demonstrate high standards of sustainable forestry as models for private landowners to emulate across the state. MACC supports continued use of some of the state lands for timber production with improvements to forestry standards and public involvement in management planning. However, for the model forestry purposes proposed, 20% of these DCR lands – which would amount to over 60,000 acres – should be adequate for this purpose. MACC urges the TSC to modify the final report to allow for up to 80% of the lands to be dedicated to reserves and parklands.

### **Biomass**

Public concern regarding potential harvesting of significant quantities of woody biomass from state lands for burning in large, inefficient electric power generation facilities was one of the reasons this process was initiated. Reports prepared by UMass assumed that over 80% of the state lands would be available for biomass harvesting. Considering that one of these facilities would burn over a ton of wood a minute or 600,000 tons per year, and that several such plants are proposed in Massachusetts and neighboring states, the concern that public lands might be overharvested to fuel these plants is understandable. The draft report proposes limits on removal of biomass from state lands, but MACC urges that the final report provide even stronger recommendations to ensure that wood from state forests will not be extracted to supply these large biomass facilities.

### **Clear Cuts and Habitat Management**

Another concern that led to this process was a trend toward increasing use of clear cuts by the state in their management practices. The rationale for these practices was to provide early successional habitat. MACC urges that the final report recommend that DCR focus on restoration of overgrown fields and pastures, maintenance of existing early successional habitats, and avoid fragmenting interior forest patches with clear cuts. The Division of Fisheries and Wildlife (DFW) should be consulted and all of DCR's management plans should reflect DFW's advice and expertise. DCR's lands should be managed for the benefit of the full range of native species found in all of the habitats that DCR owns, including the 291 rare species known to inhabit DCR properties.

**No New Commissioner or Department**

MACC opposes the proposed creation of a new position of Commissioner of Forest Stewardship and division of land management responsibilities for DCR's lands between DCR and a new agency. Dividing management between two agencies would be inefficient and unworkable, and is particularly inappropriate at a time when existing environmental agencies are struggling to fulfill their basic mandates while operating under severely reduced budgets. MACC supports modification of the Chief Forester position description to require substantial ecological management and conservation science expertise.


**Forest Cutting Practices Regulations**

The draft report includes recommendations related to private forestland management. While MACC supports many of these proposals, the report strays from the scope of work established for this process. Before these initiatives can be implemented, further public and stakeholder involvement is needed. However, two of the proposals have been under discussion in many forums for several years, and should be implemented.

First, all Forest Cutting Plans should be required to be signed by licensed foresters. Secondly, the Forest Cutting Practices regulations should be updated to improve protection for wetlands, reduce abuses of the forestry exemption from the Wetlands Protection Act, and prevent the abuse of forests for biomass extraction. MACC commented on draft regulatory changes in 2007 that would have accomplished the first two of these three regulatory reforms. Those regulations were approved by the State Forestry Committee, the body charged by law with responsibility for issuing these regulations. However, DCR never followed through in putting these regulatory reforms out for public review and promulgation. MACC supports having this regulatory review process resume and proceed in a timely manner.

Thank you for considering these comments.

Sincerely,



Sally A. Zielinski  
President

cc: DCR Commissioner Richard Sullivan  
DCR Stewardship Council Chairman Richard Cross