

Comments submitted relative to the Manomet Study: 7-9-10

To the Dept. of Energy Resources,

As a stakeholder in the recent Forest Futures Visioning Process, I would like to make a few comments with respect to the Manomet Center Study. I attended every Technical Steering Committee meeting, participated in every Stakeholder meeting, and attended every public forum associated with the Forest Futures Visioning Process. I was in a good position to "get a feel" for how all of the participants in that process were thinking. I would like to provide some comments about what role the recommendations from that process should or did play in the Manomet Center Study.

On pages 52 -53 of the Manomet Center Study, I quote: "The harvest of tops and limbs will not be permitted from public lands if new management guidelines suggested by FFVP are adopted." I would like to point out that Secretary Bowles and Commissioner Sullivan have both stated publicly that they intend to adopt those recommendations to the fullest extent possible. Four District management plans are to be reevaluated in light of these recommendations. Work has begun on the reclassification of DCR forests and parks into new zones where (on two categories) timber harvesting will be prohibited. No new contracts for timber harvesting are being created/signed on DCR public forests under the Bureau of Forestry until a significant number of acres of public forest are designated as off limits to commercial harvesting as either reserves or parklands. The recommendations of the FFVP, that publicly held lands are to be appreciated for their full range of ecosystem services implies that the way they have been stewarded in the past did not in fact balance properly this full range of services. Given this new view of the stewardship of public lands, I believe the Manomet Center Study should have given even more weight than it did to the conclusions that can be drawn from implementation of the recommendations. In addition: EOEEA and DCR were so impressed by the general goals of the FFVP that they are voluntarily taking steps to apply them to land management in the Watershed Division. Management Plans in that Division are being reevaluated as we speak, and a decision to not issue new timber sale contracts in that division for at least a year has just been issued from EOEEA and DCR. Furthermore, the contracts that are in place are being revised. It is my understanding that at least two contracts for substantial cutting have been canceled. This is clear evidence of the intention of EOEEA and DCR to adopt the recommended principles of the Forest Futures Visioning Process and to expand the area those principles will cover..

Two major points for you to consider with respect to the Manomet Center Study: It is not "if" the FFVP is adopted, it is "BECAUSE" the FFVP has been adopted and will be extended to other public lands that the biomass industry will not have access to the harvest of tops and limbs from public lands. In addition to the fact that tops and limbs will not be available, the amount of public lands subject to commercial timber extraction will be reduced. It is not just "probable" that historical data with respect to amount of timber harvesting on public land can not be used to anticipate future harvest levels, it is EXCEEDINGLY IMPORTANT TO UNDERSTAND THAT previous average harvesting levels on public lands will not serve as an indicator of future harvest levels due to this important new view of the stewardship of public forests. There will be less harvesting on public lands in the future.

I was present when the Technical Steering Committee discussed the need to preserve all tops and limbs on the harvest sites of the woodlands. During the discussions, various drafts of the recommendations included a prohibition of "whole tree harvesting" because it was deemed inappropriate and too aggressive for public lands and as causing residual stand damage to standing trees and to soils. The removal of whole trees was also determined to represent a loss of natural habitat in the forest and a loss of the source nutrients for the soils. This prohibition captured the sentiment of the majority of the TSC and stakeholder members. I don't believe the language was left in for the final draft, but those of us who requested that it remain were told that the prohibition on the removal of tops and limbs would amount to the same practical end result as outlawing whole tree harvesting..

I think I am fair when I say that the recommendations of the Forest Futures Visioning Process reflect that the serious and diverse group of experts and citizens who participated in that 10 month deliberation agreed that the treatment of public lands must be different from the treatment of commercial timber extraction operations. Indeed, it was clearly stated that public lands are not to be exploited for commercial gain and that any cutting must serve the biodiversity and social values of these lands as well as their economic value as a supply in some

cases of timber products. The Manomet Center Study should expect that there would be NO TOLERANCE FOR AN INCREASE IN HARVESTING or ANY TOLERANCE FOR THE REMOVAL OF TOPS AND LIMBS FROM PUBLIC LANDS to respond to demand from biomass plants for fuels. The social and ecological values of these public lands are not to be underestimated. The passion of those who will defend the social and ecological values of these lands is not to be underestimated either, and was an important part of the recommendations that flowed from the FFVP.

In addition to participating in the FFVP, I have also read all of the documents exchanged between the state and Scientific Certification Systems of California, the auditors of state forestry for FSC certification. Currently the state is NOT green certified, but it is my understanding that it hopes to regain that certification in the future on its woodlands by conforming to certain conditions placed upon them.. The report below is from the findings of the recertification audit in spring, 2009. Even though I personally do not believe that FSC certification is appropriate for multiple purpose publicly owned forest lands, I do wish to copy and paste for you a condition of certification because it demonstrates that even they, who support sustainable timber extraction for commercial purposes, demonstrate some concern for the impact on our forests, soils and natural biodiversity from proposed biomass plants:

http://www.mass.gov/Eoeea/docs/eea/lf/green_certification_report_2009.pdf

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<p>Non-conformity: A coarse woody debris standard has been developed for leaving 200 cubic feet of material that is four inches in diameter or larger. The current standard does not cover the full intent of the FSC Indicators 5.3.c., 6.3.b.2, and 6.3.c.1. (i.e., woody biomass requirements for both wildlife habitat and nutrient cycling/soil productivity) and there is no specification for wood debris in larger diameter classes. The guideline is also not articulated in the plan or logging contract. It is not clear how compliance would be measured and how employees are trained to ensure the standard is addressed. This issue has elevated importance due to the planned bio-energy facilities.</p>	
<p>CAR 2009.15</p>	<p>The existing woody debris retention guidelines must be expanded to fully cover the intent of 5.3.c., 6.3.b.2, and 6.3.c.1., (i.e., woody biomass requirements for both wildlife habitat and nutrient cycling/soil productivity). Furthermore, the agencies must implement the guidelines by ensuring that the coarse woody debris standard is measurable, is incorporated into contracts, and that training exists to support implementation.</p>

In addition, I helped to collect some of the 120,000 signatures from Massachusetts registered voters who wanted to put the referendum item on the ballot to restrict the subsidies and financial incentives for biomass and other "burning" operations that intended to create electricity in the name of clean and green renewable energy. I can tell you that the general public supported this referendum issue because they were opposed to biomass plants for a multitude of reasons. The complex point of carbon emissions was only one of the many reasons people in Massachusetts do not want these biomass plants. They of course prize our forested landscape and did not want anything to disturb or destroy that landscape. The Manomet Study did consider both the CO2 emissions and the availability of wood supply. But there are other factors: People are opposed to threats to

human health from negative impacts on air quality, they are concerned about the impact on our rivers (used to cool the plants), and to the increased need for diesel truck traffic to deliver wood supplies and remove ash from these plants. It is important for the Dept of Energy to realize that the considerable opposition to biomass plants in Massachusetts is based on more than the Manomet Center Study was hired to address. While we don't expect the study to attempt to address these issues, it is important for the conclusions of the study to take into account that the residents of the state will resist any aggressive timber harvesting to fuel biomass plants **BECAUSE THEY ARE OPPOSED TO THE PLANTS FOR ALL OF THOSE REASONS COMBINED.** I suggest that the wood supply must be estimated to be even less than the study concludes.

Respectfully submitted: Claudia Hurley