

## **Forest Futures Visioning Process Landscape Designation Draft Public Comments— Highlights and Common Themes**

By Claudia Hurley

Note: The public comments are available on the DCR website at this link:

<http://www.mass.gov/dcr/ld/Spring%20Landscape%20Designation%20Comments-%20final%20version.pdf>

### *Summary*

There are 601 pages of comments, over 420 individual comments and an additional list of names of people who signed postcards specifically requesting protections of the Buckley Dunton Lake area of October Mountain.

There are a sizable number of comments that appear to be using a form letter to request no commercial logging on any state public forests, parks, watersheds or wildlife areas. Although the Department of Conservation and Recreation (DCR) submitted a draft that proposes parklands, reserves and woodlands, many of the people who signed the form letter had requested previously that there be no commercial timber extraction and were repeating this request in spite of the compromises of the Forest Futures Visioning Process (FFVP). The dominant theme behind this request is that publicly held “protected” lands are only 4% of the total Massachusetts land area, only 6% of its 3,100,000 acres of forests. None should be used for the economic interest of private industry.

It is noticeable that certain DCR draft designations are opposed by significant numbers of people in close proximity to those properties. A partial list of those “controversial “ designations follows:

Opposition to the Woodland Designation for:

Portions of October Mountain that include Buckley Dunton Lake, Finerty Pond, the Appalachian Trail and the headwaters of three major rivers. Comments stressed the tourism and passive recreational uses of the area were incompatible with the woodland designation.

Georgetown Rowley State Forest, Bald Pate Pond State Park, Cleaveland State Forest, Harold Parker State Forest. All are in the Northeast region in a densely populated area where citizens, including local and state politicians have all requested a more appropriate parkland designation.

Pittsfield State Forest where the City Council, Senator Downing and many recreational users of the property request the parkland designation, citing all the parkland criteria, the location in the heart of the Berkshires, near the largest city in the Berkshires. The woodland designation is incompatible with current uses and the property is a key tourist attraction in the area..

Mount Watatic Reservation where comments point out that this 277 acre property is owned by six different entities, that DCR did not have the “right” to designate it a woodland, that the woodland category violates the “understandings” of the six entities as to how the property would be managed.

Conway State Forest: citizens and Con Com: details regarding the sensitive habitat and watershed qualities, more appropriate as a reserve or parkland amidst other contiguous sensitive properties.

The portion of F. Gilbert Hills State Forest known as Foxboro State Forest where multiple comments stressed that the parkland category would be more appropriate.

Hawksnest State Park: already labeled a park, containing a pond of central value to the property and

habitat for the box turtle, plant species of special concern, and rare damselflies. Contains a passionate plea from members of the family who founded the park.

The Southeastern Massachusetts Bioreserve. Just the name says “not right for a woodland”

There were carefully assembled suggestions of changes of designations in Wendell State Forest, Mt. Grace and the Warwick State Forests where whole towns got together their relevant planning boards and local conservation commissions and other town committees and studied the maps/pertinent data and sent in widely agreed upon suggested changes with well documented reasons for their suggestions.

There were multiple comments with regard to the need for a small or patch reserve category. The FFVP had recommended such a category so that “special” or sensitive areas (beyond those containing listed species) could be designated as such, with individual management strategies to suit the unique characteristics of the property. DCR proposed, by contrast, to have zone one protections in parkland and woodland designations serve this purpose. Some suggested that zone one protections would need to be “upgraded” for this idea to work. Others suggest it is essential to recognize these unique areas in advance of any proposed active management or recreational use changes so that there is a level of guarantee of their protection, and so we do not depend on DCR staff to identify them in the midst of planning activities. Hence, the predetermined “patch reserve” category. It was pointed out that there are no large or small reserves designated within the Route 128 loop around Boston. It was pointed out that all old growth should automatically be classified as a reserve, but is not.

Specific examples of old growth not currently protected in reserve designations are: the 200 acres atop Wachusett Mountain State Reservation, and a portion of the Mohawk-Savoy-Monroe 9<sup>th</sup> forest reserve which has been “lost” in the current draft designations. Since it often requires expert training to identify old growth, comments were consistent that it deserves reserve designations. The additional issue of permanence for such designations is clear: How could a reserve, approved by the DCR Stewardship Council in 2005 be lost in the 2011 draft designations?

Reserve concerns are related to very strong opinions about the need for site specific resource management plans as required by Massachusetts State Law. There is recognition of the lack of resources to complete these plans, and the amount of time and personnel required to complete them, therefore, comments suggested that in the meantime DCR err on the side of caution with respect to major changes in either management or use of properties until RMP's could be completed. There were several comments accepting less than “ideal” designations if they were accompanied by an RMP before any management occurred.

Also related to the comments regarding the need for small reserves are comments that point out that the reserve category was meant for large reserves, ideally of (or with the potential for) 15,000 acres. There are no such large reserves, but suggestions where they might be possible: October Mt. State Forest, the Savoy/Monroe/Dubuque Forest complex, The Wendell/Erving/Warwick forests and areas in Central Massachusetts where public and private conservation lands could be combined into a large reserve. At least 23 properties that received “reserve” designation are less than 2500 acres each. Many comments suggest that these 23 properties, with a total of 23,803 acres were precisely the properties that were meant to be small patch reserves and were never intended to be included in the large reserve totals.

There were multiple comments concerning the fact that the Patrick Administration urged DCR to “protect from commercial timber extraction” at least 60% of its forested properties, and that DCR has claimed to meet that goal by including over 40,000 acres of non forested properties in the parkland category. While these non forested publicly owned properties probably do by default fall into the parkland category, DCR could well afford to add more parkland and reserve designations to reach the goal of “protecting” 60% of its FORESTED properties. Many comments suggested that DCR may have made some arbitrary decisions

when it came up with the “perfect” 60% - 40% split, when in fact properties were supposed to be classified by their dominant ecosystem services.

The issue of whether DCR truly places value on public input was raised in several comments. There were compliments about the effort DCR has made to implement the recommendations of the FFVP, but they were accompanied by suggestions that the format of the public meetings did not provide for the best possible exchange of ideas, that DCR must not only accept public comments, but revise the designations in response to the comments and take specific actions that signify that they respect and have learned from the input.

Just recently, MA Audubon has noted a troubling example: the Wachusett Mountain Associates have apparently made a request to clear a 4 acre area on Wachusett Mountain that is designated as a Biodiversity Significance Overlay in the RMP for the area. This is a major change that may not be consistent with the RMP. DCR indicates that it will hold a public informational meeting concerning their intentions. Public information meetings where the public is “told” what will happen are not the same as opportunities for input that could have an impact on the final decisions.

There are some comments suggesting that DCR can not “afford” to maintain its properties without commercial timber sales suggesting the properties will suffer without active management, but there are multiple suggestions of ways to handle maintenance issues without commercial logging, and offers from a public willing to volunteer and provide ideas. There are multiple comments from recreation groups who fear loss of access to public lands. Parkland requests such as at Willowdale are related to opposition to the limitations on new trails that could occur in lands designated as reserves.

There are comments reflecting concerns over how the “push” for clean green energy will affect public lands. There are comments regarding the amount of forest materials that should be available to fuel biomass plants, and there are questions about the siting of energy, waste or demonstration projects on public land without sufficient opportunity for local input or even agency input into those decisions.

There are multiple requests that the Forest Reserves Science Advisory Committee be chosen very soon to advise on not only management of reserves, but also other issues related to sensitive areas.

In general the public is looking to DCR to be responsive to public input, provide permanence for decisions that are made with broad public acceptance, and to enforce those decisions. There are requests that the final designations not be rushed and that DCR take the time to get this right.

This is not a complete analysis of the public input; please excuse or point out omissions. It is meant to give a “feel” for the carefully stated viewpoints that came from a large cross section of the Massachusetts public. A lot of people used a lot of time and effort to express themselves. There is an expectation and hope that DCR is willing to take stewardship of its public lands in a new direction and that the public will have a respected role in the decisions that are made.

Respectfully,  
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