



June 25, 2009

The Honorable Michael W. Morrissey
Room 413D
State House
Boston, MA 02133

Re: Wind Energy Siting Reform Act (H.B. 3065, S.B. 1504)

Dear Senator Morrissey,

I am writing against the Wind Energy Siting Reform legislation on behalf of the Facilitators to the Massachusetts Forest and Park Friends Network, an all volunteer, grassroots organization formed to facilitate communication between Friends groups supporting DCR properties statewide.

Though we are all strong supporters of wind power, we stand against legislation that streamlines the turbine siting process. Each proposal must have careful review, which includes full participation by local agencies and citizens who best know the land and who will have to live with turbines. Without an appropriate local public process, citizens and organizations will be forced into seeking legal action against the state to stop turbines in areas of contention. No one wins when the public process is thwarted.

State forests are already in danger of exploitation due to increasingly strong pressure to increase wood product extraction and to use trees as a primary source of biofuel. The Department of Conservation and Recreation (DCR) and the Executive Office of Energy and Environmental Affairs (EOEEA) have poor records when it comes to protecting state lands. For example:

- 1) the state recently lost its Forest Stewardship Council (FSC) “green certification” for sustainable timber products. A report from Scientific Certifications Systems, expected soon, will explain why EOEEA lost its certificate. We need to evaluate DCR’s forestry practices in light of this report;
- 2) 2 1/2 years after the DCR Stewardship Council asked DCR to complete an off-highway vehicle enforcement plan. DCR has not completed a plan. We need to know why;
- 3) the two completed Ecoregion Assessments, a requirement of FSC certification, are severely lacking in site-specific data on natural resources other than harvestable timber, yet DCR continues to generate more “assessments”. We need to question the validity of these assessments as management tools;

4) DCR has not completed Resource Management Plans for our forests and will not be able to complete them for many years. M.G.L. Chapter 21: Section 2F, requires DCR to develop Resource Management Plans (RMPs) for all agency reservations, parks and forests. Forest Resource Management Plans, prepared by the Bureau of Forest Fire Control and Forestry, are to be integrated into RMPs. DCR has ignored this mandate and allowed extensive commercial logging on state lands before completing its primary task of developing RMPs! This is outrageous. We need responsible stewardship of our forests.

The state has repeatedly failed citizens in providing protection and responsible use of our forests. Any legislation that removes what little protection state lands have from continued abuse and misuse must not be allowed to pass. More, not less public input is needed in guiding the use of state lands. State agencies need do the hard work of completing RMPs, of creating credible management strategies, of enforcing regulations and show citizens that protecting natural resources—using them for their highest value—is the highest priority. Until we have that assurance, we must not allow shortcuts in the wind siting permitting process.

Thank you for considering our comments.

Sincerely,

Sharl Heller

For the Massachusetts Forest and Park Friends Network Facilitators:

Mike Ryan

Claudia Hurley

Ellen Arnold

Mike Toomey

Cc: Senate President Theresa Murray

Representative Vinny DeMacedo

Representative Frank I. Smizik

Department of Conservation and Recreation Commissioner Rick Sullivan

Department of Energy Resources Commissioner Philip Giudice