

# MASSACHUSETTS FORESTS AT THE CROSSROADS

*Forests, Parks, Landscapes, Environment, Quality of Life, Communities  
and Economy Threatened by Industrial Scale Logging & Biomass Power*



**Deerfield River, Mohawk Trail**



**Windsor State Forest, 2008, “Drinking Water Supply Area, Please protect it!”**

MASSACHUSETTS   FOREST WATCH

March 5, 2009

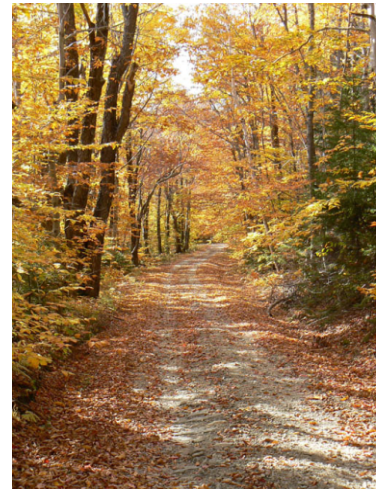


## **EXECUTIVE SUMMARY**

The fate of Massachusetts' forests is at a crossroads.

Taxpayer subsidized policies and proposals enacted and promoted by Governor Patrick's office of Energy and Environmental Affairs seriously threaten the health, integrity and peaceful existence of Massachusetts forests. All the benefits provided by these forests including wilderness protection, fish and wildlife habitat, recreation, clean water, clean air, tourism, carbon sequestration and scenic beauty are now under threat from proposals to aggressively log parks and forests as outlined below.

- About 80% of State forests and parks are slated for logging with only 20% set aside in reserves. (p.4)
- Aggressive logging and clear-cutting of State forests and parks has already started and new management plans call for logging rates more than 400% higher than average historical levels. (p. 5-18)
- "Clear-cutting and its variants" is proposed for 74% of the logging. Historically, selective logging was common. (p. 5-18)
- The timber program costs outweigh its revenue. Taxpayers are paying to cut their own forests.(p.19)
- The State has enacted laws and is spending taxpayer money devoted to "green" energy to promote and subsidize the development of at least five wood-fueled, industrial-scale biomass power plants. These plants would require tripling the logging rate on all Massachusetts forests, public and private. At this rate, **all** forests could be logged in just 25 years. Over 185,000 logging truck trips per year, or 600 per day, would be required on narrow, rural roads to deliver the wood. If constructed, air pollution and atmospheric CO2 will increase and forests will be heavily logged to provide a mere 1% increase in power generating capacity. Achievable conservation measures could reduce electrical use by 33%. (p.21-22)
- Massachusetts has passed a law to reduce carbon emissions, yet proposes aggressive cutting and burning of forests in 5 biomass power plants that would increase statewide power plant CO2 emissions 11% for the only 1% increase in electrical generating capacity.. The proposed Russell plant CO2 emissions per unit energy would be 50% higher than the worst CO2 emitting existing power plant in the northeast. (p.25-26)
- To sell the radically increased logging to the public, the agencies managing forests are exercising propaganda techniques by using forestry half-truths, distortions, omissions and falsehoods to justify clear-cutting and aggressive logging. (p. 28-32)
- Massachusetts taxpayers are unwittingly spending millions of dollars to qualify for "green" certification of State public land timber harvesting. Instead of protecting the ecosystem and ecological values of State forests, this certification is proving to be a "greenwashing" program that promotes commercial logging over conservation. **All of the photos in this report are of FSC "green" certified logging.** (p.34)
- Five of the larger Massachusetts environmental groups, who have historically acted as watchdogs over our precious public forests are no longer dependably defending them from the chainsaw. They have recently endorsed plans for drastic logging increases in our State forests and parks. (p. 36-37)
- The State agencies responsible for managing Massachusetts public lands are not adhering to existing laws designed to help protect these forests. Examination of current logging practices has uncovered widespread illegal State logging. (p. 38-39)



Monroe State Forest

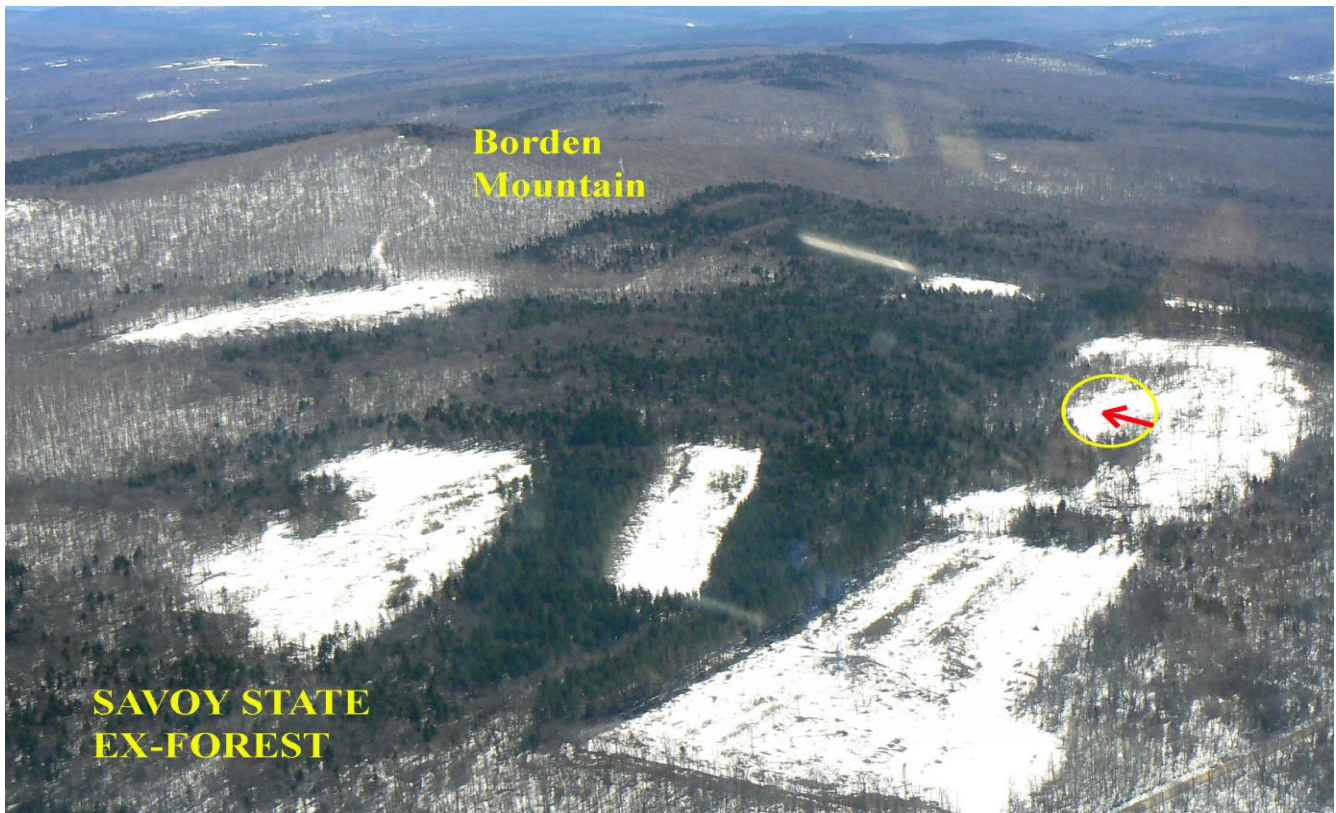
### **To protect Massachusetts forests and save valuable taxpayer dollars, we call on Governor Patrick to:**

- (1) Enact an indefinite commercial logging moratorium, **without loopholes**, on all State forests & parks, cancel FSC certification and sponsor legislation to protect the public and ecosystem values of our lands.
- (2) Stop permitting new biomass power plants and remove taxpayer subsidies and preferential legislation for burning whole trees and contaminated waste for power and for cutting whole trees to convert to biofuels.



*“Savoy State Forest....over 50 miles of wooded trails invite year-round recreational access to spectacular natural features. Or climb up Spruce Hill on the Busby Trail for breathtaking views, especially during fall foliage and hawk migration.”*

DCR Website



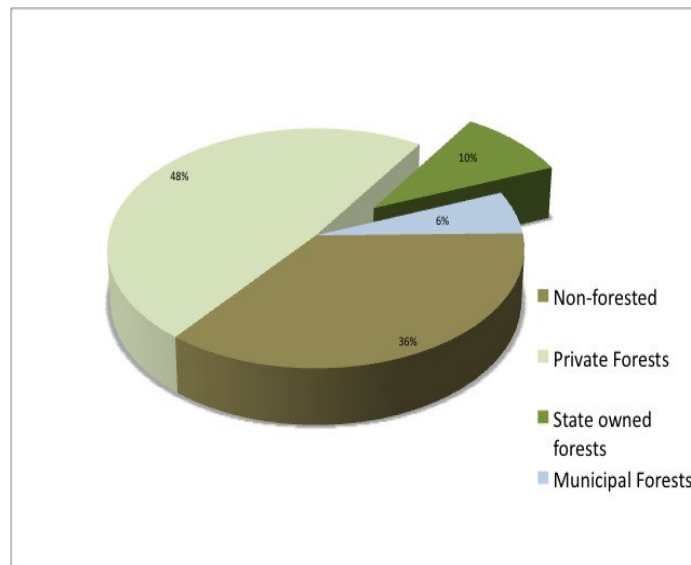
AERIAL VIEW, SAVOY STATE FOREST, NEW STATE RD, CLEARCUTS, 2008



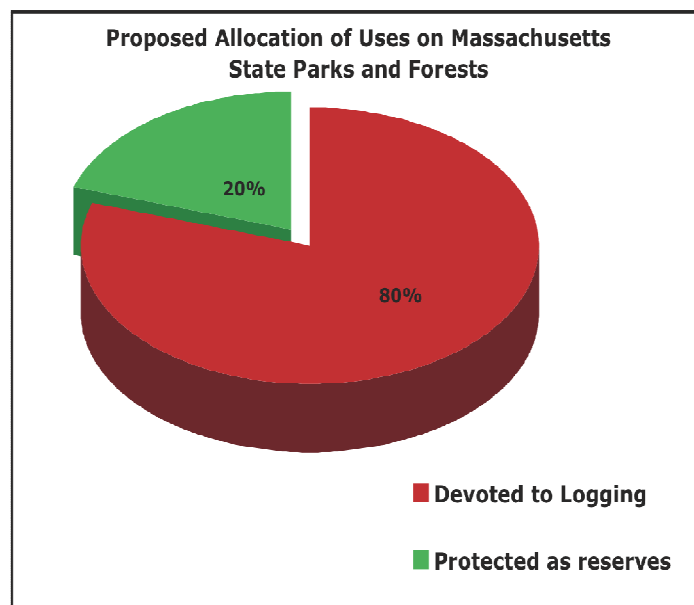
GROUND VIEW OF LOCATION MARKED IN THE PHOTO ABOVE, 2008

## **MASSACHUSETTS STATE FORESTS – PRECIOUS AND UNDER THREAT**

State forests and parks make up only 10% of Massachusetts land area and 16% of its forests. Because they are publically owned and in relatively intact large blocks, they provide the best opportunity for protecting forests in their natural state for recreation, tourism, clean air and water, solitude, and wildlife habitat for species that need large undisturbed forest tracts.



Unfortunately, these lands are not protected as we might like to believe. On the contrary, new proposals by the Massachusetts Department of Conservation and Recreation (DCR) and the Division of Fish and Wildlife (DFW) threaten to make logging the primary use of our State lands. According to current proposals, only 20% of the State's forests, (2% of Massachusetts' land area), would be protected in reserves, and the remaining 80% will be open to logging.<sup>1</sup>



Managing 80% of these scarce and precious public lands primarily for the extraction of timber products by private corporations is out of step with the wishes of the public who own these lands and demonstrates that DCR and DFW are falling far short of fulfilling their charge to serve the interests and desires of the citizens of Massachusetts.<sup>2</sup>



## **MASSACHUSETTS STATE FORESTS – PROPOSED DISTRICT PLANS**

The Department of Conservation and Recreation has issued their proposed management plans for four of nine districts, the Southern Berkshire District, the Central Berkshire District, the Northern Berkshire District, and the Western Connecticut Valley District.

These plans allow for an unprecedented increase in recommended logging rates to 400% higher than average historical levels, 74% of which is **even-age logging**, a.k.a. “clear-cutting and its variants” instead of single-tree selection logging.<sup>3</sup> These historical comparisons and new levels of logging data come from the State’s own plans and represent industrial scale logging on Massachusetts State forests. Even when compared to cherry picked maximum historical rates of the mid 1980’s, the new cutting rates are many times higher.

State agencies don’t like to use the word “clear-cut” in their plans and instead prefer euphemisms such as “shelterwood,” “aggregate retention,” “thinning,” “seed tree,” etc., but clear-cutting is what they are doing. Under even-aged management, which includes clear-cutting and variations of clear-cutting, all or nearly all of the trees are removed from an area of forest in a short time period. The trees that replace this former forest are about the same age, hence the term “even-aged” management. Even-aged forests are historically very uncommon and unnatural in Massachusetts.

A letter signed by world-renowned Harvard scientist E.O. Wilson states *“Clearcutting and other even-aged silvicultural practices and timber road construction have caused widespread forest ecosystem fragmentation and degradation. The result is species extinction, soil erosion, flooding, destabilizing climate change, the loss of ecological processes, declining water quality, diminishing commercial and sport fisheries.”*<sup>4</sup> The problems with clearcutting and even-aged logging are summarized on page 6.

Below are even-aged logging photos on Massachusetts’ publicly owned State forests.



“Shelterwood” Cut, Savoy State Forest, 2008



“Shelterwood” Cut, Savoy State Forest, 2008



“Shelterwood” Cut, October Mountain State Forest



“Aggregate Retention”, Peru WMA

## **PROBLEMS WITH CLEARCUTTING AND EVEN-AGED MANAGEMENT**

In a letter endorsing legislation to change National forest management policy, over 600 leading biologists, ecologists, foresters, and scientists including Harvard's E.O. Wilson declare that, ***“Clearcutting and other even aged silvicultural practices and timber road construction have caused widespread forest ecosystem fragmentation and degradation. The result is species extinction, soil erosion, flooding, destabilizing climate change, the loss of ecological processes, declining water quality, diminishing commercial and sport fisheries”***.....***“Even-age logging includes the application of clearcutting, high grading, seed-tree cutting, shelterwood cutting, or any other logging method in a manner inconsistent with selection management.”***<sup>4</sup> (see: [www.saveamericasforests.org/congress/congress.htm](http://www.saveamericasforests.org/congress/congress.htm)) According to the new legislation endorsed by these scientists, clear-cutting and other forms of even-age logging operations:

- Cause significant deleterious effects on native biodiversity, by reducing habitat and food for cavity-nesting birds and insectivores
- Disrupt the soil surface, compact organic layers and expose the soil to direct sunlight and precipitation
- Deplete the habitat of deep-forest species of animals, including endangered and threatened species
- Reduce habitat and food supplies which disrupt the lines of dependency among species and their food resources and thereby jeopardize critical ecosystem function, including limiting outbreaks of destructive insect populations
- Render soil increasingly sensitive to acid deposits by causing a decline of soil wood and coarse woody debris which reduces the capacity of soil to retain water and nutrients, which in turn increases soil heat and impairs soil's ability to maintain protective carbon compounds on the soil surface
- Disrupt the run-off restraining capabilities of roots and low-lying vegetation, resulting in soil erosion, the leaching of nutrients, a reduction in the biological content of soil, and the impoverishment of soil
- Increase harmful edge effects, including blow-downs, invasions by weed species, and heavier losses to predators and competitors.
- Limit areas where the public can satisfy an expanding need for recreation and decrease the recreational value of land.
- Replace forests with a surplus of clearings that grow into relatively impenetrable thickets of saplings
- Frequently lead to the death of immobile species and the very young of mobile species of wildlife
- Aggravate global climate change by decreasing the capability of the soil to retain carbon, and during the critical periods of felling and site preparation, reducing the capacity of the biomass to process and to store carbon, with a resultant loss of stored carbon to the atmosphere.
- Increase stream sedimentation and the silting of stream bottoms, causing a decline in water quality and the impairment of life cycles and spawning processes of aquatic life from benthic organisms to large fish which in turn causes a depletion of the sport and commercial fisheries
- Cause harmful and in many cases, irreversible, damage to forest species and forest ecosystems



Even-aged Logging, October Mountain SF, 2008

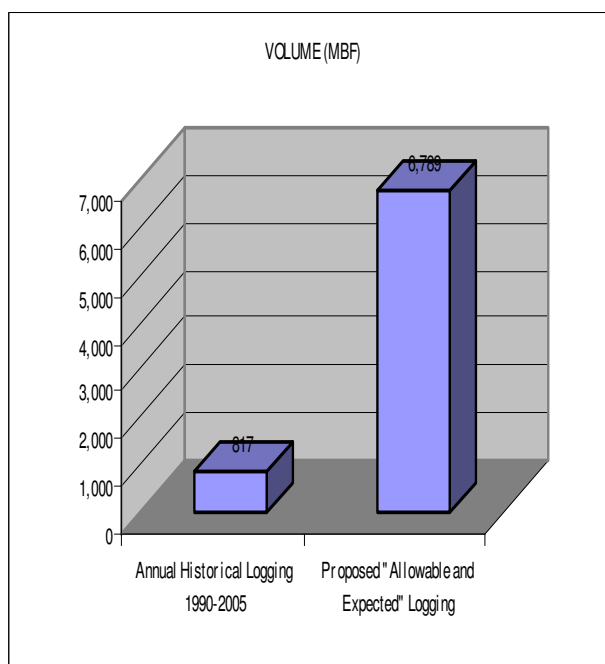
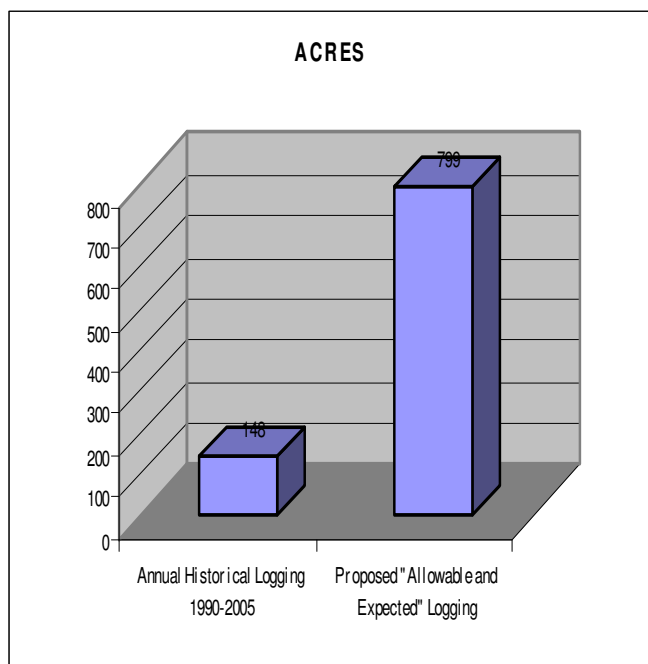
In areas where logging occurs, these scientists call for individual tree selection management which retains the natural forest structure and function, focuses on long-term rather than short-term management, works with, rather than against the checks and balances inherent in natural processes, and permits the forest to go through the natural stages of succession to develop a forest with old growth ecological functions. Additionally, selective logging is more job intensive, and therefore provides more employment and produces higher quality sawlogs than clear-cutting and even-age logging



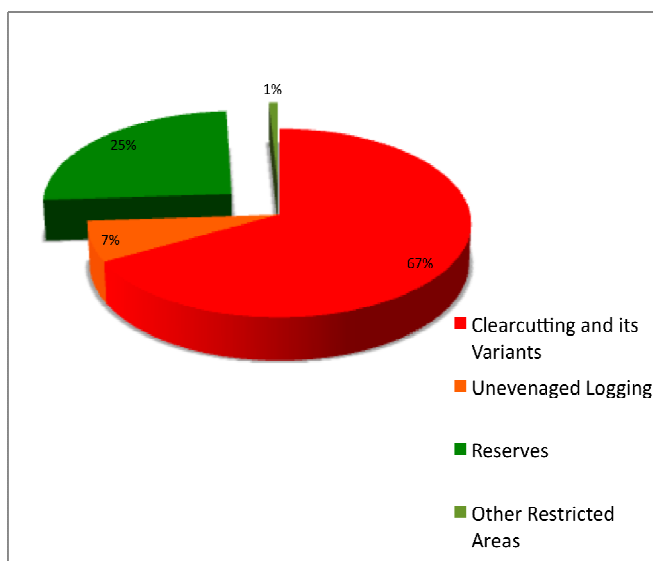
## The Central Berkshire District

The “Central Berkshire District” of Massachusetts Forest and Parks system consists of 31,251 acres of which 23,040 acres, or 74%, are open to logging. The forests in this district include Bryant Mountain State Forest, Gilbert A. Bliss State Forest, Krug Sugarbush/Dead Branch State Forest, Becket State Forest, Chester-Blandford State Forest, Huntington State Forest, C.M. Gardner State Forest, Peru State Forest, Middlefield State Forest, Ashmere Lake State Park, Worthington State Forest, October Mountain State Forest, Pittsfield State Forest, Wahconah Falls State Park

Where previously, an average of 148 acres were logged each year, the new plans allow for logging to increase to 799 acres per year. Where previously an average volume of 817 thousand board feet were removed annually, the new plans allow for an increase in removals to 6,789 thousand board feet per year, or 730% higher than historical levels.<sup>5</sup>



**Of the proposed areas open to logging, only 2,200 acres would be devoted to extended rotation, uneven-age management, leaving 20,840 acres open to “clear-cutting and its variants.”<sup>6</sup>**



**Central Berkshire District Management Plan**

***“At 16,500 acres, October Mountain is the largest State forest in Massachusetts. Here visitors can camp, hike and enjoy the outdoors while they visit nearby Tanglewood and other Berkshire Region points of interest.” DCR Website***



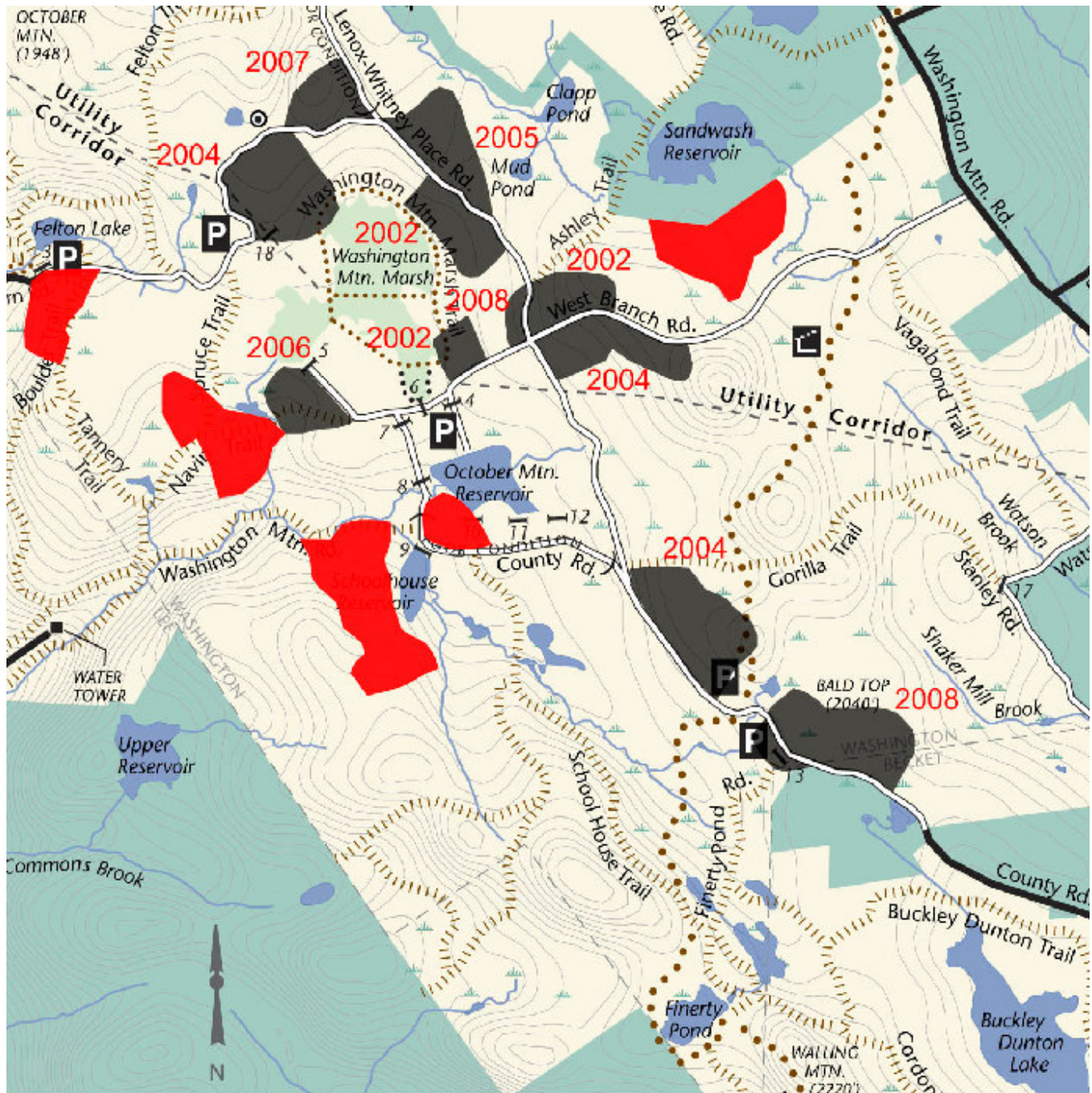
County Road, October Mountain State Forest, Four Corner Area, 2008



West Branch Road, October Mountain State Forest, 2007



**OCTOBER MOUNTAIN STATE FOREST**  
**“FOUR CORNER” AREA**  
**Logged Forests 2002-2008**  
**and Proposed Logging**



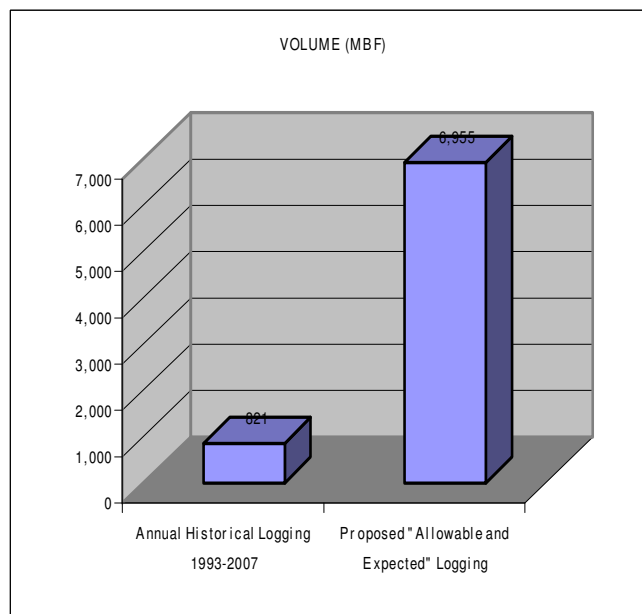
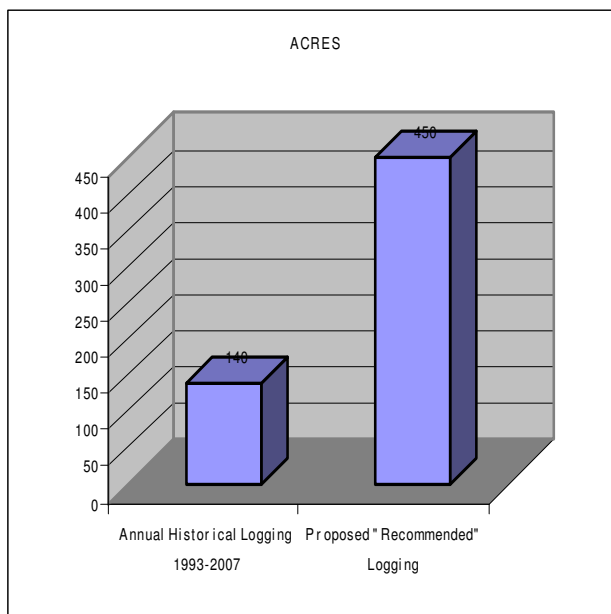
The areas shown in black depict some\* of the areas clearcut and heavily logged over the last 7 years and the areas shown in red indicate areas slated for new logging in the “Four Corners” area, the heart of October Mountain State Forest

\*Cutting plans were not available for all the logging, so all the areas cut during this period are not shown

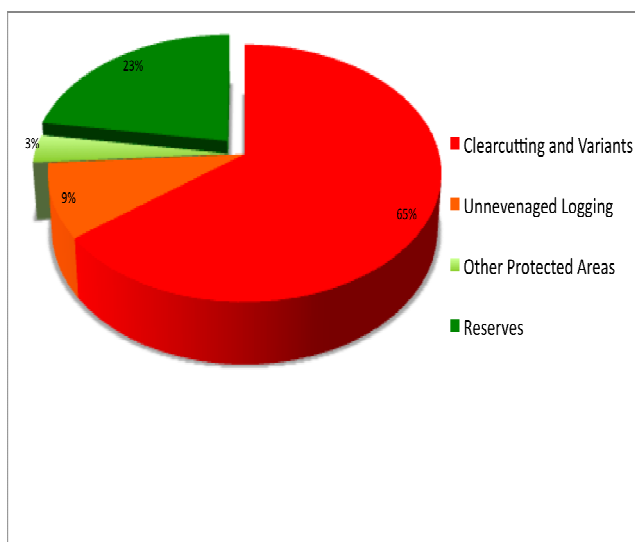
## The Southern Berkshire District

The “Southern Berkshire District” of Massachusetts Forest and Parks system consists of 42,965 acres of which 31,753 acres, or 74%, are open to logging. The forests in this district include Mt. Washington State Forest, Bash Bish Falls State Park, East Mountain State Forest, Mt Everett Reservation, Jug End State Reservation and Wildlife Management Area (WMA), Otis State Forest, Beartown State Forest, Fountain Pond Park, Arthur Wharton Swann State Forest, Sandisfield State Forest, Cookson State Forest, Silver Brook North F.C. Site, Silver Brook South F.C. Site, Clam Lake F.C. Site, Campbells Falls State Park, Tolland State Forest, Granville State Forest

Where previously, an average of 140 acres were logged on these forests each year, the new plans recommend a logging increase to 450 acres per year. Where previously an average volume of 821 thousand board feet were removed annually, the new plans allow for an increase in removals to 6,955 thousand board feet per year, or 750% higher than historical levels.<sup>7</sup>



**Of the proposed areas open to logging, only 4,000 acres would be devoted to extended rotation, uneven-age management, leaving 27,753 acres open to “clear-cutting and its variants.”<sup>8</sup>**



**Southern Berkshire District Management Plan**



***“Beartown State Forest offers visitors a chance to glimpse deer, bear, bobcat, fisher and other wildlife, including the park's namesake, the Black Bear. Brooks, beaver ponds, rich deciduous forest, flowering shrubs and wildflowers and fall foliage are plentiful. The Appalachian Trail passes near Benedict Pond and offers spectacular wooded views.”***

DCR Website



**Beartown Mountain Rd, Beartown State Forest, 2008**

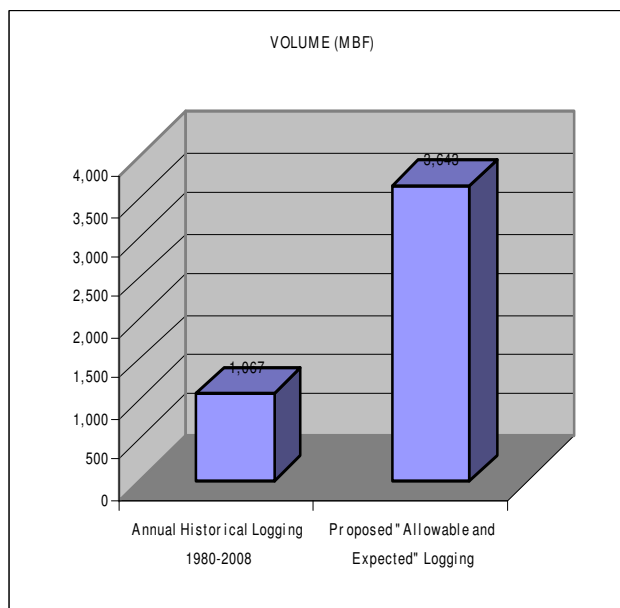
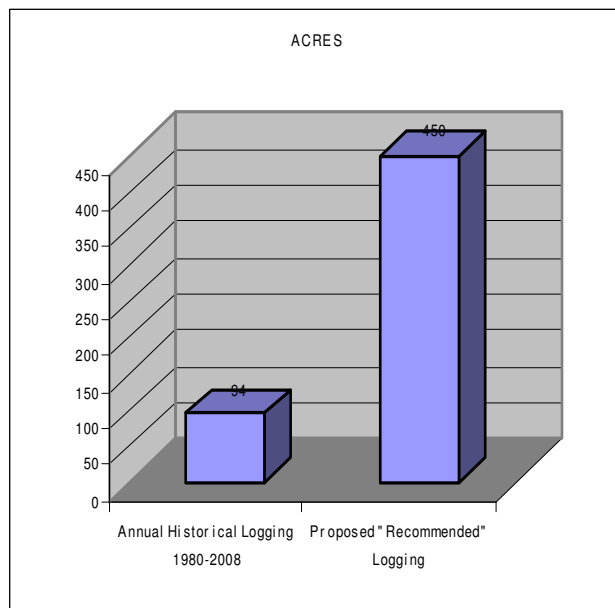


**Logging the slopes of West Lake, Sandisfield State Forest, 2008**

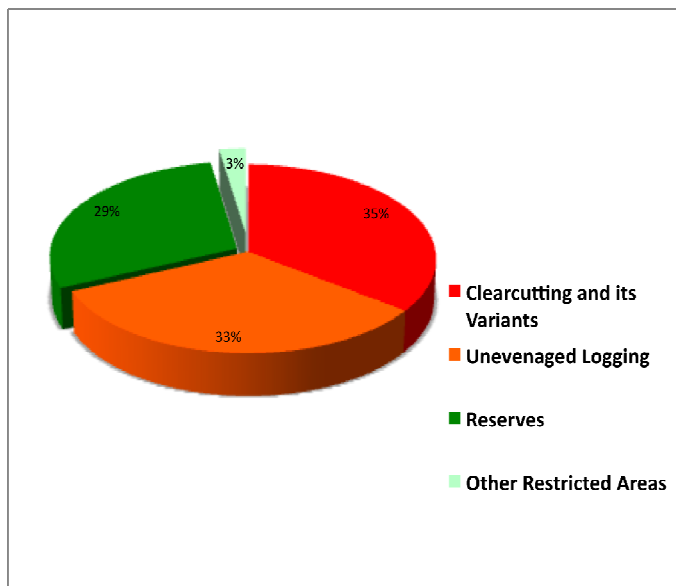
## The Western Connecticut Valley District

The “Western Connecticut Valley District” of Massachusetts Forest and Parks system consists of 29,048 acres of which 19,836 acres, or 68%, are open to logging. The forests in this district include, Monroe State Forest, H. O. Cook State Forest, Leyden State Forest, Savoy Mountain State Forest, Windsor State Forest, Florida State Forest, Deer Hill State Reservation, Mohawk Trail State Forest, Dubuque Memorial State Forest, Buckland State Forest, Catamount State Forest, Conway State Forest, Shelburne State Forest, D.A.R. State Forest, and South River State Forest

Where previously, an average of 94 acres were logged on these forests each year, the new plans recommend a logging increase to 450 acres per year. Where previously, an average volume of 1,067 thousand board feet were removed annually, the new plans allow for an increase in removals to 3,643 thousand board feet per year, or 240% higher than historical levels.<sup>9</sup>



**Of the proposed areas open to logging, only 9,580 acres would be devoted to extended rotation, uneven-age management, leaving 10,256 acres open to “clear-cutting and its variants.”<sup>10</sup>**



**Western Connecticut Valley Management Plan**



*“Our State parks are a vital treasure for the Commonwealth. By the end of my administration, I hope each and every park is something that we can all be proud of”*  
Governor Patrick <sup>11</sup>



**WINDSOR JAMBS STATE PARK – NEAR SCHOOLHOUSE ROAD, 2008**



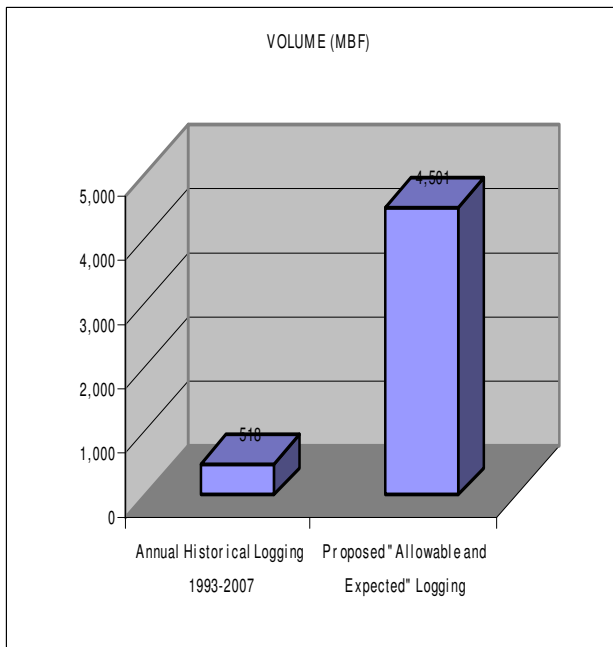
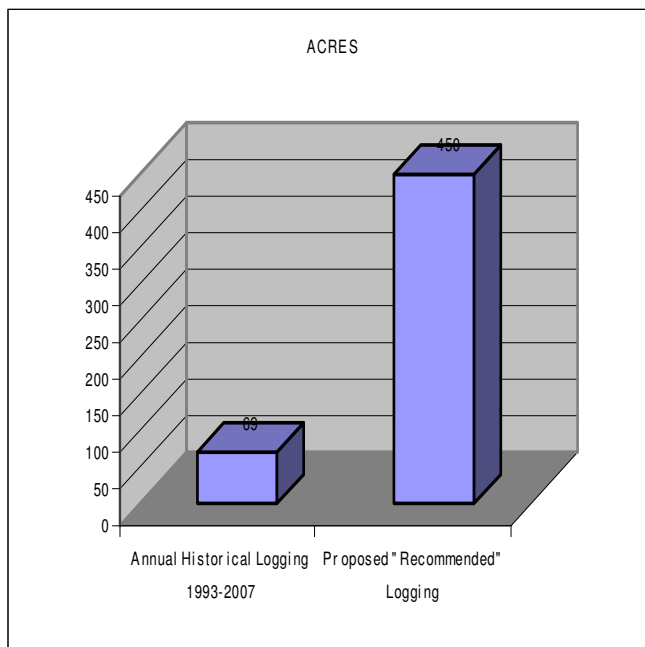
**QUABBIN STATE PARK – NEAR VISITORS CENTER, 2008**



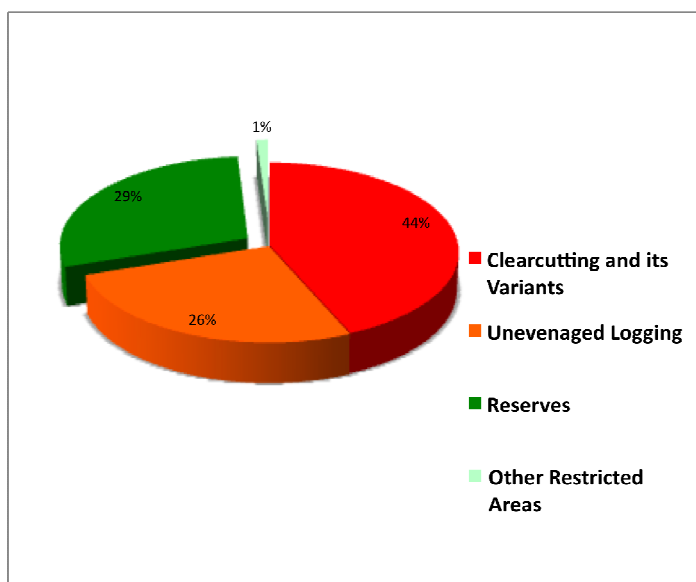
## The Northern Berkshire District

The “Northern Berkshire District” of Massachusetts Forest and Parks system consists of 40,953 acres of which 28,616 acres, or 70%, are open to logging. The forests in this district include Balance Rock State Park, Bates Memorial State Park, Clarksburg State Forest, Florida State Forest, Mohawk Trail State Forest, Mt. Greylock State Reservation, Natural Bridge State Park, Pittsfield State Forest, Savoy Mtn State Forest, Taconic Trail State Forest, Windsor State Forest and Parks.

Where previously, an average of 69 acres were logged on these forests each year, the new plans recommend a logging increase to 450 acres per year. Where previously, an average volume of 518 thousand board feet were removed annually, the new plans allow for an increase in removals to 4,501 thousand board feet per year, or 770% higher than historical levels.<sup>12</sup>



Of the proposed areas open to logging, only 10,825 acres would be devoted to extended rotation, uneven-age management, leaving 17,791 acres open to “clear-cutting and its variants.”<sup>13</sup>



**Northern Berkshire District Management Plan**



***“Savoy Mountain State Forest makes it easy to leave the everyday world behind. Scenic North and South Ponds, with wooded edges and hills rising in the distance, offer tranquil places to fish, picnic and swim.”*** DCR Website



New State Road, Savoy State Forest, 2008

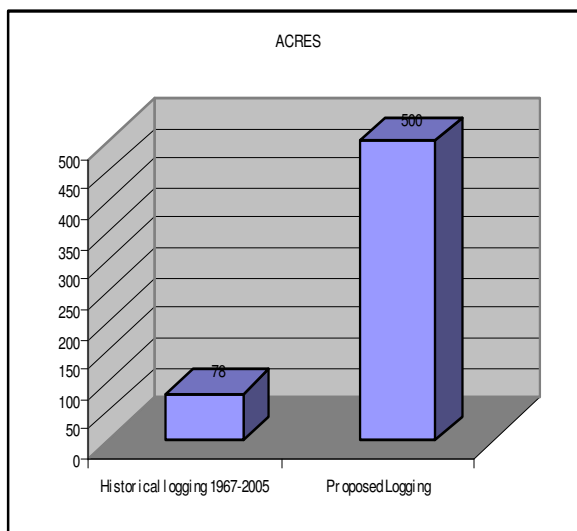


Aerial View of large 44 Acre Cut, Bannis Road, Savoy State Forest, 2008

## Department of Fish and Wildlife

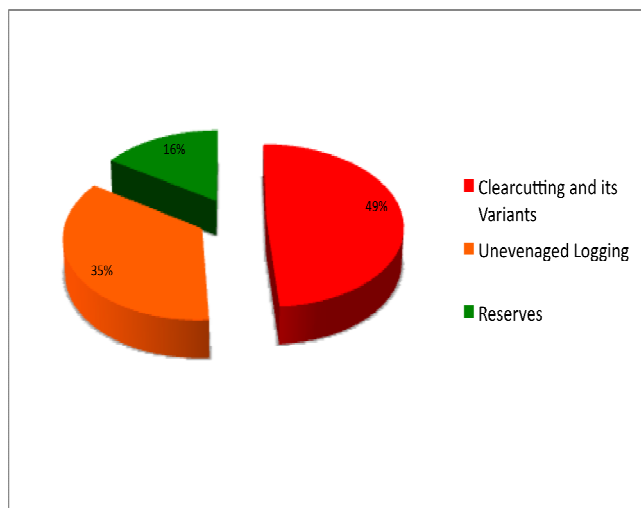
The Department of Fish and Wildlife (DFW) manages 110,000 acres Wildlife Management Areas and has published two Draft Forest Management Plans, one for the “Taconic Mountains Management Zone” and one for the “Marble and the Berkshire Highlands Management Zone.”

Under these proposed management plans, the DFW proposes to increase logging to levels more than 400% greater than historical levels, from a 40 year annual historical average of 78 acres to about 500 acres per year.<sup>14</sup>

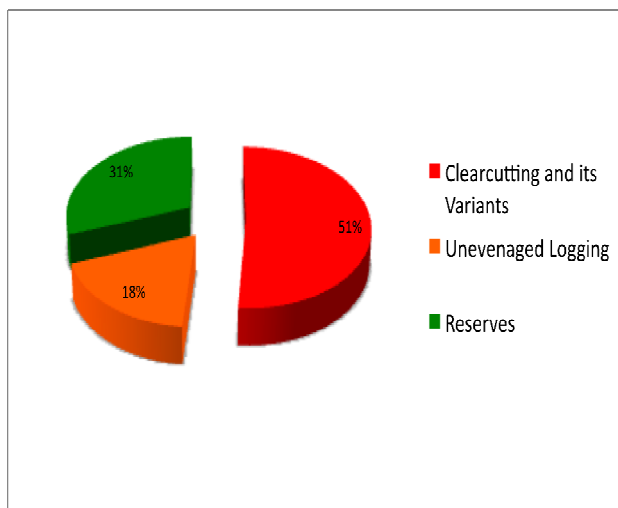


The “Taconic Mountains and Marble Valleys Forest Management Zone” consists of more than 6,654 acres in 23 properties. Of the lands in this district, 4,742 are forested. Under the draft Resource Management Plan, the DFW will devote at least 2,400 acres of upland forest in the Taconic Mountains and Marble Valleys Forest Management Zone to even-aged management (i.e. clear-cutting and its variants), and will “devote up to 1,732 acres” of upland forest to uneven-aged logging.<sup>15</sup> Only 770 acres will be off limits to logging and managed as reserves.

The “Berkshire Highlands Forest Management Zone” includes more than 34,000 acres in 35 properties. Under the draft Resource Management Plan for this district, the DFW will “devote at least 16,000 acres” of these areas to even-aged management (i.e. clear-cutting and its variants), and will “devote up to 5,689 acres” to uneven-aged logging.<sup>16</sup> Only 9,000 to 9,500 acres will be off limits to logging and managed as reserves.



**Taconic Mountains and Marble Valleys**



**Berkshire Highlands**



*“The Massachusetts Division of Fisheries and Wildlife is responsible for the conservation - including restoration, protection and management – of fish and wildlife resources for the benefit and enjoyment of the public. ~DFW Website*



**Google Earth “Before” photo of large, un-fragmented, interior, hardwood forest**



**Aerial View “After” photo of now fragmented, clear-cut forest, same location  
Fox Den Wildlife Mgmt Area, Chipman Rd, March, 2008**



## The Quabbin Reservoir

Under DCR, the Office of Watershed Management manages and *protects* the drinking water supply watersheds for approximately 2.2 million residents of Massachusetts, primarily in Greater Boston.



### **QUABBIN RESEVOIR - PRESCOTT PENINSULA WILDERNESS AREA**

**Clearcutting the Prescott Peninsula Wilderness Area, 2008  
Hiking is Illegal to Protect the Watershed**



SR202 - 2007



Gate 31 - 2007



Gate 35 - 2007



SR202 - 2007



## **ECONOMY AND COSTS**

A close look at the economics of the timber program reveals that when all the costs are accounted for, the Massachusetts State timber program costs more than it makes. In effect, the public is unwittingly spending scarce taxpayer dollars to cut down their own forests. This loss is particularly egregious when the price for timber is low as it is now, but occurs even under better market conditions.

As is similar with the National Forest timber program, when all the costs are calculated, including all the direct and indirect costs such as maintaining the roads to access the trees; employee salaries, pensions and benefits; vehicles, supplies and equipment; mapping, planning and studies; boundary surveying, marking and maintenance; monitoring and inventories; herbicide applications; office space, equipment and support staff; etc., the costs are more than the income. Private industry benefits by having the public pick up these costs while they can obtain the timber at low cost and gain favorable profits.

This public loss can be illustrated by looking at the costs and incomes for the district plans. For example, according to the Management plans provided by DCR, the expected annual costs for the Northern Berkshire district are \$408,000 and the income is \$264,000 leading to an expected loss of \$144,000 each year on this district alone.<sup>17</sup> This loss does not even include indirect costs, and the income amount is calculated using timber prices significantly higher than current levels. Additionally, the millions of dollars required to qualify for the FSC certification program and its annual costs need to be accounted for.<sup>18</sup>



Taxpayers funds well spent? HO Cook State Forest, Nov, 2008

Most importantly, the non-extractive benefits of our forests far outweigh timber receipts. Tourism is a \$14 billion dollar industry in Massachusetts, with 22 million annual visitors.<sup>19</sup> The MA office of travel and tourism estimates that non-residents of Massachusetts contribute \$10 billion annually to the state's economy for activities related to forests and the outdoors while wood products generate less than \$1 billion.<sup>20</sup> Ecosystem services, including freshwater supply, biodiversity, aesthetics, stormwater mitigation, nutrient regulation, soil retention, and climate control, are valued at nearly \$3 billion annually.<sup>21</sup>

According to the Massachusetts Division of Employment and Training, resource extraction activities, including forestry, make up less than 1% of employment statewide. Even in the western parts of the state, which hold the majority of the states public and private forestlands, employment in all resource extraction activities hovers around the 1% mark.<sup>22</sup> Some of the loggers currently cutting the trees on State forests are from out of state and most of the logs are shipped to northern New England or Canada.<sup>23</sup> Additionally, the local timber industry has already degraded much of the private forests through a half century of extensive "high grading"<sup>24</sup>, where they have cut the best and left the rest. Now many of these private forests no longer have much high quality timber, so industry is looking to public forests to access high quality trees.

It is irrational and reckless to cutover the landscape to add a few more jobs to this now highly mechanized industry. Not only does it threaten the employment and economy of the much more important tourism and recreation industries, and reduce ecosystem and quality of life benefits, but it squanders scarce and valuable taxpayer dollars. Additionally, the State has spent over \$800,000 taxpayer dollars<sup>25</sup> in 2008 on grants to private landowners for "habitat improvement". While this may sound admirable, "habitat improvement" in our Orwellian era has come to often mean clearcutting the property, a very dubious benefit to wildlife. Thus taxpayers are paying private landowners to clearcut their property. (see Propaganda Section, p.31)

Interestingly, the Massachusetts State Pension fund began investing in the timber industry in 2002,<sup>26</sup> the same year the State's FSC "green" certification program was initiated.<sup>27</sup>



***Governor Patrick's office of Energy and Environment  
is not respecting our public lands...***



**Savoy State Forest, 2008**

***....nor are they respecting our past, present or future citizens***



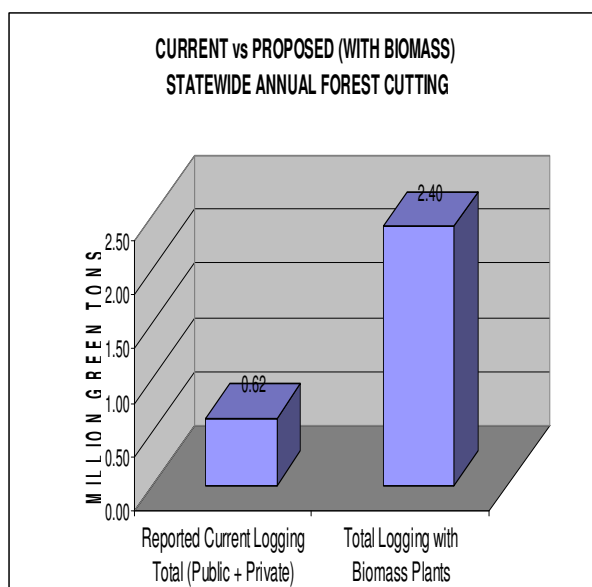
**Public forest clear-cut right up to the tombstones in an 1800's cemetery  
Adams Road, Savoy State Forest, 2008**



## ALL MASSACHUSETTS FORESTS THREATENED BY BIOMASS POWER

Currently there are plans to build at least five, large-scale taxpayer subsidized, wood-fired biomass power plants in the western Massachusetts. (Greenfield, Russell, Springfield, Pittsfield and Fitchburg)<sup>28</sup> These proposals would require burning massive quantities of wood to provide minimal amounts of power and would worsen air and water pollution, add 3 million tons of carbon dioxide to the atmosphere annually,<sup>29</sup> divide communities, squander taxpayer dollars and heavily cut our important forests.

At least 2.4 million tons of wood, including 1.8 million tons of whole trees, or **8 million trees**, would be burned each year (4 tons every minute) to fuel these large power plants.<sup>30</sup> For perspective, DCR records show current annual State forest land logging of 0.05 million tons of wood, and annual private land logging of 0.57 million tons.<sup>30</sup> Even when accounting for purported quantities of available waste wood and ignoring other biomass projects and serious proposals to cut trees for biofuels, **logging rates would need to triple** on all forests, public and private, in order to provide a continuous supply of wood.<sup>30</sup> **At this rate, all forests, State and private could be logged, in whatever fashion, in only 25 years.**<sup>30</sup> To deliver the wood, about **600 logging truck trips per day, or 184,000 trips per year** would occur on mostly narrow, rural roads.<sup>30</sup>



Claims that these plants will not use live trees and only burn clean waste wood is an “exploded myth”<sup>31</sup> which doesn’t add up and is clearly false as demonstrated by the following facts.

The DCR maintains a “Marketing and Utilization” website promoting biomass power as having “*tremendous potential in Massachusetts due to the State’s 3 million acres of “underutilized” forestland*” and has commissioned reports entitled “Forest Harvesting Systems for Biomass Production” and “Forest Biomass Harvesting-Silviculture and Ecological Considerations” which target public forests to provide biomass fuel.<sup>32</sup> This second report states “*the public forest land base for harvesting is 460,000 acres*” and “*the planned increase of biomass harvesting will be occurring in a region where forests are owned and managed largely for the ecosystem services they provide, such as habitat conservation, clean air and water, and recreation*” and warns that “*public support could quickly wane if the program appears to focus too closely on industrial-scale harvesting.*”<sup>33</sup>

Mass Audubon has warned the State that, “*the proposed Biomass Initiative targets raise concerns regarding potential effects on management not only of private lands but also for the commonwealth’s publicly protected conservation lands, particularly the Department of Conservation and Recreation’s state forests and parks.*”<sup>34</sup>

In addition to the telling fact that there are already State forest timber sales to supply existing, relatively small biomass power projects,<sup>35</sup> the following disturbing House legislation (dropped, **for now**) is helpful for discerning the frightening effects wood-fueled biomass power could mean for Massachusetts forests.

House 4373, An Act Relative to **Green** Communities, Section 71. *The department of clean energy shall, in consultation with the Department of Conservation and Recreation, a representative from the Bureau of Forestry, and the Department of Environmental Protection, commence a public rulemaking process no later than July 1, 2008, to examine the use of non-sustainably harvested virgin wood as a biomass fuel for inclusion in Class I and II of the Massachusetts renewable portfolio standard pursuant to section 11F of Chapter 25A of the General laws. Said process shall be complete on or before July 1, 2009.*<sup>36</sup>

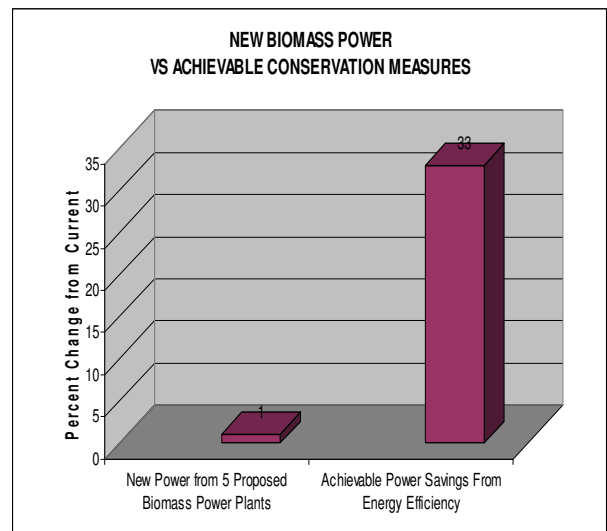
Burning forests for energy is a step backwards and would worsen our environmental problems, not help solve them, particularly in light of increasing wood demands for heat and now serious proposals to turn large quantities of Massachusetts trees into biofuels.<sup>37</sup> In fact, a recent study by Stanford University has identified cellulosic ethanol (i.e. biofuel from wood) as the **worst** of the renewable energy options, **even worse than fossil fuels**. According to the report, "*Ethanol-based biofuels will actually cause more harm to human health, wildlife, water supply and land use than current fossil fuels.*"<sup>38</sup> Interestingly, the highest paid state worker in Massachusetts is a biofuels specialist at the University of Massachusetts, with an annual salary of \$613,000, more than 4 times higher than the Governor's salary.<sup>39</sup>

With already polluted skies and carbon dioxide levels dangerously increasing, it is irrational and reckless to chop down forests and burn them for minimal amounts of cheap power. To add insult to injury, public funds are being diverted from truly clean and green technologies to subsidize cutting and burning of trees, which will help foster a cynicism of "clean" and "green" in conscientious citizens growing increasingly wary of "greenwashing" by government and industry.

Building these plants would come with the many costs and consequences mentioned above yet would only provide 185 MW of power, a just over 1% increase on the current 14,000 MW generating capacity in Massachusetts.<sup>40</sup> Phantom loads, the loads drawn when electrical equipment is not even on, account for 5% of total electrical use and can easily be mitigated<sup>41</sup>. Overall, achievable efficiency measures could provide a 33% reduction in electricity use.<sup>42</sup>



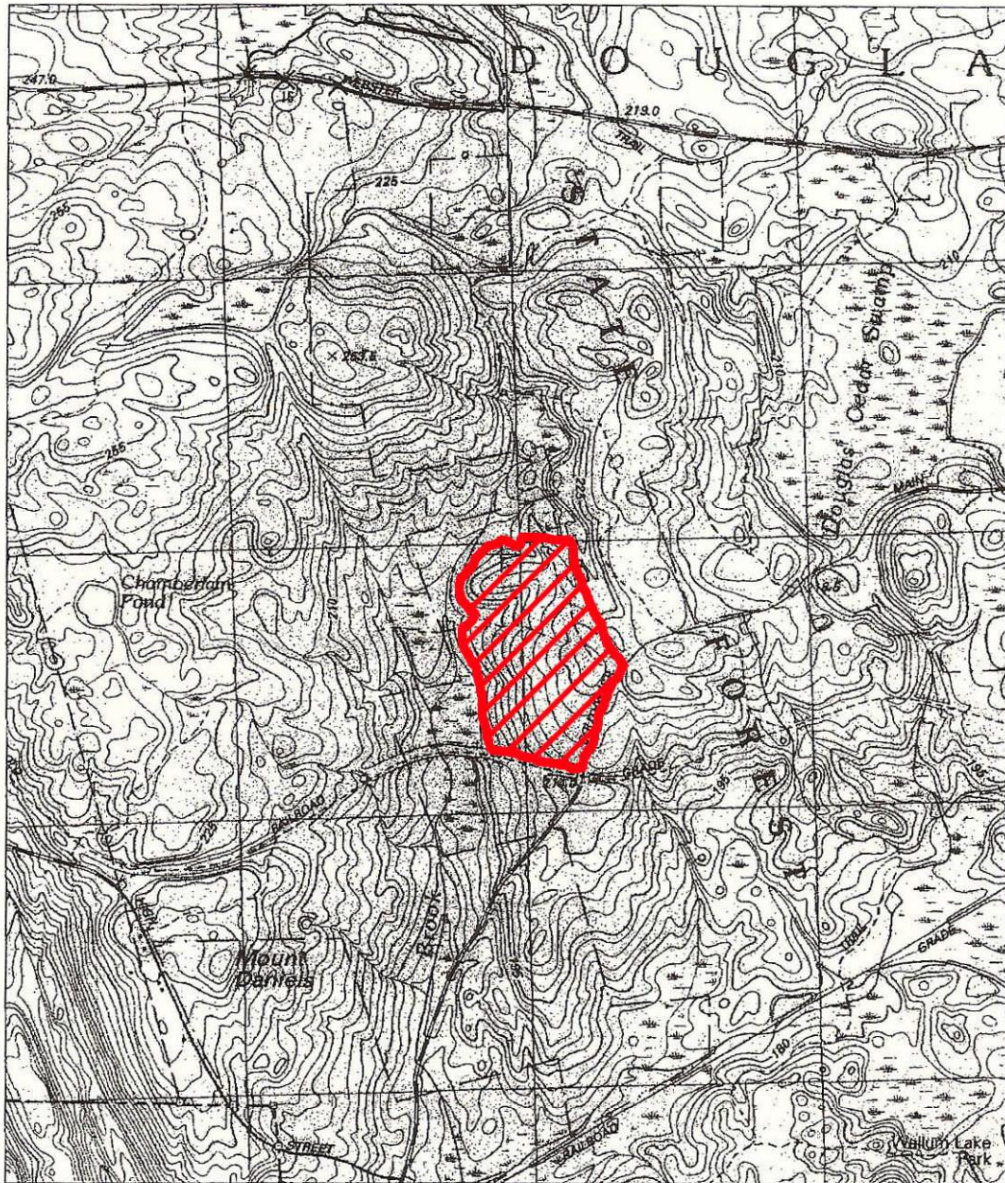
40 MW Biomass Plant, Livermore Falls, ME



During this era of polluted skies, global warming, asthmatic children and government deficits, the last thing we need to do is build taxpayer subsidized biomass power plants that will lead to aggressive cutting, burning and inhaling of forests. We need to keep forests alive, growing and cleaning the air and water. A school child understands this concept, when will Governor Patrick's office of Energy and Environmental Affairs realize it? Instead, in their own words, they are "aggressively pushing" the development of biomass power.<sup>43</sup>

Imagine the folly of using a washroom electric hand dryer designed to save trees knowing that trees are being cut and burned to power the dryer, or faithfully recycling paper products to save trees knowing that 2 million tons of trees are being cut to be burned each year.





## Douglas S.F. Biomass Sale Locus Map

US State Plane 1983  
Massachusetts Mainland 2001  
NAD 1983 (Conus)



Scale 1:25,000  
0 3,000  
Feet

A graphic scale bar with a black and white checkered pattern, indicating a distance of 3,000 feet.

Rt-16.ssf  
6/9/2008  
GPS Pathfinder® Office  
 Trimble

## 2008 BIOMASS TIMBER SALE DOUGLAS STATE FOREST



## ***Cutting and burning forests is not “green” energy***

(Photos below of current clear-cut logging on state forests are a preview of the logging that would occur statewide to fuel large scale biomass energy and biofuels proposals)



**Windsor Jamb State Park, 2008**



**Savoy State Forest, 2008**



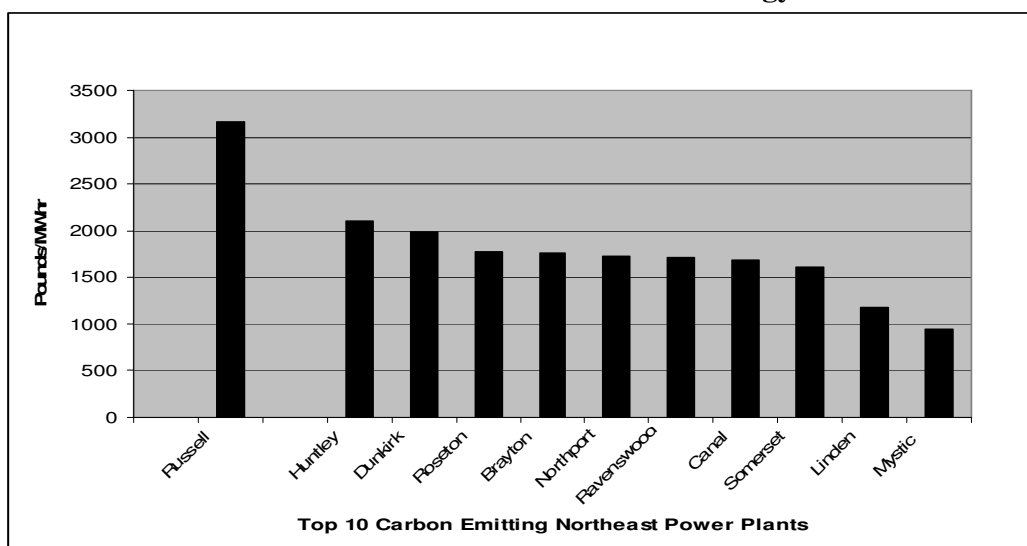
## **GLOBAL WARMING – LOGGING AND BURNING FORESTS AND CO2**

Biomass is typically touted as a carbon neutral fuel and burning biomass is sold as “green” energy. The key assumption about carbon neutrality is unsubstantiated and impossible, yet is slavishly repeated by biomass proponents and the press. However, an awakening from this irrational wishful thinking is starting to occur. For example, the Massachusetts Department of Public Utilities in their recent partial rejection of Russell Biomass’ request to overturn Russell’s zoning bylaws, wrote that uncertainties about sustainability “prevent the Department from reaching a conclusion on the likely carbon impact of this facility.”

As mentioned earlier, five large-scale biomass plants are proposed for Massachusetts which would **add 3 million tons of carbon dioxide annually into the atmosphere, or an 11% increase in statewide power plant CO2 emissions.**<sup>44</sup> If the fuel to cut, chip and transport the wood were included, this number is even higher. However, the carbon situation is much worse than this because now the forest’s ability to sequester carbon has been reduced and the forest root systems will decay and release additional stored carbon.

Russell biomass is one such proposed facility. The project proponents estimate in their Expanded Environmental Notification Form (EENF) that the plant will emit 1,732 tons per day of carbon dioxide, or 3158 lbs/MW<sub>hr</sub>.<sup>45</sup> **This means the Russell plant would release 50% more carbon dioxide per unit energy produced than any of the worst carbon dioxide emitting power plants in the Northeast.**<sup>46</sup>

**RUSSELL BIOMASS**  
vs  
**WORST NORTHEASTERN POWER PLANTS**  
**Instantaneous CO2 Emissions Per Unit of Energy Produced**



Source:  
MassPIRG  
“More Heat  
than Light”

In sum, the CO2 increases from these plants include emissions from petroleum based logging of massive amounts of forest, chipping the wood, hauling it up to 100 miles in trucks that get about 6 miles per gallon, building a \$150 million facility and then burning the wood at only 25% efficiency (per EENF). Additional long-term CO2 increases are caused by a reduction in the forests ability to sequester carbon and the decay of the forest root systems. **It is impossible for this facility, or others like it, to be carbon neutral because it would require instantaneous forest growth to replace what is cut and burned. Furthermore, any increase in forest cutting negatively affects the current baseline condition of forest growth versus cutting and mortality. Carbon neutrality of a project requires no net change to this ratio.** Clearly, allowing the maximum forest growth rate possible is the best option for improving atmospheric CO2 levels.

Russell biomass and similar large biomass projects are a lose-lose-lose-lose proposition that would increase air and water pollution, release excessive carbon dioxide to the atmosphere, put harmful logging pressures on our carbon dioxide-sequestering forests and squander taxpayer clean energy funds.



Deforestation is a major contributor to greenhouse gas emissions. In fact, the United Nations Food and Agriculture Organization reported in October 2006 that deforestation accounts for 25 to 30 percent of the release of greenhouse gases. The report states: “*Most people assume that global warming is caused by burning oil and gas, but in fact between 25 and 30 percent of the greenhouse gases released into the atmosphere each year – 1.6 billion tons – is caused by deforestation.*”<sup>47</sup> While less destructive, even selective logging adds carbon to the atmosphere.<sup>48</sup>

According to a study by a Deutsche Bank economist that was commissioned by the European Union, “*the global economy is losing more money from the disappearance of forests than through the current banking crisis*” and that the “*losses are great, and continuous*”<sup>49</sup> The report estimates that the annual cost of forest loss at between \$2 trillion and \$5 trillion from quantifying the value of the various services that forests perform, such as providing clean water and absorbing carbon dioxide. It projects that forest decline could be costing about 7 percent of global Gross Domestic Product and that the greatest cost to western nations would initially come through losing a natural absorber of the most important greenhouse gas. The report refers to temperate as well as tropical forests.

Recent research shows that forests that have a past history of logging have less ability to sequester carbon dioxide than unlogged forests. Other research shows that biofuels such as ethanol have very negative impacts and consume more energy (in the form of petroleum inputs) than they generate.<sup>50</sup> A similar analysis of biomass is sorely needed before we charge ahead with these facilities that drive heavy logging that could take decades to recover from. It may turn out that our best alternative is to leave the forests alone. If they have been destroyed before we do an analysis, we may have lost our best option through carelessness and haste. In order to put some brakes on this runaway train, a moratorium on commercial logging of State forests should immediately be implemented and taxpayer subsidies for large biomass plants should be halted.

Massachusetts likes to claim it is progressive in the arena of green and alternative energy, and has even passed a global warming bill committing itself to reducing carbon dioxide emissions. However, these efforts stand in stark contrast to the promotion of biomass technology that is based on combustion and emitting carbon which also damages carbon sequestration potential by cutting down trees. Massachusetts should be focusing efforts on low-carbon release technologies and energy conservation rather than subsidizing biomass projects with scarce taxpayer funds.



Carbon Neutral? Peru Wildlife Management Area, 2008

According to a 2007 Massachusetts Department of Energy Resources document, conservation is the cheapest form of energy, costing only 3.2 cents per kilowatt-hour versus 8.9 cents for new energy production, and furthermore, opportunities for conservation are substantial.<sup>51</sup> Solar, hydro, tidal, wind and geothermal energy are not based on combustion with its inevitable CO<sub>2</sub> emissions. We need to pursue more advanced energy strategies and think bigger than heretofore. More significant change is needed than just a switch from one dirty combustible fuel to another, especially if we intend to leave a habitable planet for our children.

In light of these facts, it would be a huge mistake, crazy even, to cut down our trees and burn them in biomass plants. Many of the consequences of these irrational ideas would be difficult, expensive, and time-consuming to reverse. A course correction is urgently needed before too much damage is done.



***“Forest Health”?***



**Monroe State Forest, 2008**

***“Protecting the Watershed”?***



**Quabbin Reservation, Gate 15, Stream enters Quabbin in 500' , 2007**



## **PROPAGANDIZING TO THE PUBLIC - *Watch what they do, not what they say***

To sell the radically increased logging to the public, the responsible agencies are exercising propaganda techniques by using half-truths, distortions, omissions and outright falsehoods to justify the clear-cutting and aggressive logging. By using greatly exaggerated and manufactured threats, cherry-picked scientific data and other arbitrary and capricious reasons to sell the logging, the agencies are not leveling with the public they are hired to serve.

Almost all logging is sold as beneficial to wildlife, for forest health, or to avoid some catastrophic threat, while the detrimental environmental effects of the logging are barely mentioned. In fact, the DCR Chief Forester changed rationales for a timber sale in Robinson State Park **more than 10 times** as each reason was proven invalid by independent experts.<sup>52</sup> Eventually, economic motivations surfaced and the sale was halted due to citizen protest.

### **Manipulation of public sentiment is illustrated in peer review comments to the FSC “Green” Certification Report for Management of MA Forests, William M. Healy, Wildlife Biologist:<sup>53</sup>**

*“The motivation for timber harvest seems to have a strong influence on public acceptance of timber harvest. The review team noted the distinct public “personas” of MDC, DFW, and DEM. I agree and characterize them as follows:”*

*“MDC: Good forestry means lower water rates. **That slogan will sell in Boston.**”*



Shelterwood Cut, Savoy State Forest, 2008

*“DFW: They are the wildlife people, “helping wildlife with habitat management.” The review team noted that DFW is prohibited by State statute from clearcutting, and yet they promote young age classes..... I once visited a game land to watch a machine, nicknamed the brontosaurus, reduce 40-foot tall trees to chips in a few seconds. Pretty impressive machine, and it sat in the middle of an impressive “non-clearcut.”*

*“The public seems to put a hierarchy of values on the motives for management, and intense disturbances such as clearing or controlled burning are acceptable when they are done to benefit wildlife or rare communities. Unfortunately, cutting trees for profit seems to fall at the bottom of that scale of values.”*

***“Planning effort should frame timber harvest in the context of maintaining plant and animal diversity, improving wildlife habitat, and protecting rare habitats.”***

*“DEM also needs to decide the “persona” it wants to project. Perhaps DEM should strive to become “the biodiversity team.” That umbrella would cover a multitude of activities.”*

*“DEM: It is more difficult for me to make a one-line caricature and slogan for DEM.....I think a good image for DEM would be “keepers of the forest,” and “growing trees for the future.” I am quite sure that “DEM - the timber people—cutting trees for bigger budgets” would be a publicly unacceptable and politically unsupportable image.”*

***“... If there were a statewide ballot referendum tomorrow, asking if timber cutting should be allowed on State forests, the “no” votes would win handily.”***

**Comments to draft changes in the forest practice code illustrate the propaganda model by simply changing the definition of clear-cut from ½ acre, to 2 or 3 acres<sup>54</sup> (note: 1 acre = 1 football field)**

*“Comment: 1/2 acre is too small an area to trigger the sensitive word “clearcut”.*

*Suggestion: (amend), here and in standards to 2 or 3 acres (change 1/2 to 3 (or 2)).”*

*“Patch Cut means a clearcut of one quarter acre to one acre in size.*

*Comment: Patch cut size should be increased to 2 or 3 acres to avoid the clear-cut issue.”*

**The aggressiveness of the management plans, and paucity of public outreach is illustrated in peer review comments by Thom J. McEvoy, Resource Professor, University of Vermont:<sup>55</sup>**

*“Public input should be the driving force behind management decisions, not resource conditions or financial demands. I’m surprised the State doesn’t have a well-defined public involvement process. Public forest lands are a people’s legacy for the future, the public should have a hand in decisions.”*

*“I’m troubled by the observation that DEM (now DCR) can raise money by cutting more timber. Too often timber is made to pay the bills and this is a dangerous policy for a public agency to set in motion. **If Massachusetts residents were asked the extent to which they would like to see forests harvested to raise money to improve the management of forests, I suspect most would be appalled.**”*

*“I disagree with the statement: “...if the goal is stable long-term forest age structure for purposes other than even-flow of timber, then the consequences of under-harvesting are potentially as severe as over-harvesting.” **Timber harvesting is a means of manipulating forest succession to achieve human benefits. The only consequence of ‘under-harvesting’ is lost yield -- a human benefit.**”*

*“It is misleading to suggest negative ecosystem consequences for a strategy to harvest substantially less than the mean annual increment..... If the client were a publicly-held corporation, I might agree that there is a fiduciary responsibility to shareholders to make assets as profitable as possible, but such is not the case with public assets.”*

*“I don’t agree the landowner’s harvest regulation strategy is the most important criterion assessed in a certification evaluation, because it governs the timber sustainability for the enterprise.” What is far more important is the way a client treats the land. There is a distinct possibility that the people of the Commonwealth are not as fixated on timber as we think they should be.”*

*“With a 30-year cutting cycle, theoretically, MA will one day never see a tree older than 90. **This is an extremely aggressive schedule**, far more so than I would have guessed FSC would think appropriate. The agencies must consider if the public really wants its lands managed for timber?”*

*“....given the client owns and manages lands as a public trust, I would have expected the team to spend more time discovering just how important the lands are to the people who use them and to residents of the Commonwealth.”*



Massachusetts’ Public Forests, Shipped to Quebec

*“I did not see much evidence of public involvement in the report so I have to assume that the client does not have a well-defined process to involve the public in decision-making. For a public lands manager -- if this is true -- it is unacceptable -- **The lands belong to the people, not the agencies**”*





***BEFORE***

**“BEFORE AND AFTER”**  
**SAME LOCATION, NW CORNER,**  
**FOUR CORNER INTERSECTION,**  
**LIVING, NATIVE SPECIES, RED PINE**  
**OCTOBER MOUNTAIN STATE**  
**FOREST, NOVEMBER 2008**



***“AFTER”***



***“AFTER”***



## **FORESTRY PROPAGANDA - *Watch what they do, not what they say***

The State has distributed deceptive “Leaving a Living Legacy” brochures that use unscientific forestry propaganda to sell the idea to the public that aggressive commercial logging benefits our forests.<sup>56</sup>

**STATE PROPAGATED MYTH:** *“Through active management, the plan will regenerate areas that are at imminent risk from fire, disease and/or insects, and will improve the health of areas of the forest”*

**FACT:** “Not only is there sparse evidence that such approaches achieve their goals of increasing resistance and resilience, little evidence suggests that natural disturbances yield negative functional consequences. Therefore, current management regimes aiming to increase long-term forest health and water quality are ongoing “experiments” lacking controls. In many situations good evidence from true experiments and “natural experiments” suggests that the best management approach is to do nothing.”<sup>57</sup> (David Foster)

**STATE PROPAGATED MYTH:** Plantations are dead and dying and *“Forests are choked with foreign species like red pine and Norway spruce”*

**FACT:** The State often brings forth photos of dead or dying plantation stands to justify removing the plantations, but these photos represent small and isolated areas while the vast majority of the stands are healthy, beautiful and serving an important function. For decades, State resource agencies praised the plantations of Red pine, White pine and Norway spruce as important “wintering grounds” providing shelter for wildlife. Additionally, these plantations help offset evergreen habitat loss occurring from declining native Hemlock. Red pine is a native species in the southern edge of its range and there are scattered, very old stands around the State. It is misleading for the State to call it “non-native”. Norway spruce, while non-native, is not “invasive-intrusive,” is self-thinning and as these plantations mature, they do not become “stagnated,” but rather become impressive in their size and beauty, and provide winter habitat.

Even if the State had a valid justification for removing the plantations, which they don’t, they could be slowly and selectively removed. Heavier equipment is used to clear-cut these stands than would be used with uneven-age management. This can leave the ground torn up and the soil impacted creating the “disturbed sites” that, in turn, allow for the invasion of harmful invasive-intrusive species.

**STATE PROPAGATED MYTH:** Human intervention is needed for *“Enhancing biological diversity of the forest and the wildlife that inhabit it”*

**FACT:** State foresters espouse clear-cutting to create “early successional habitat” to help wildlife and logging for forest health. Closer examination invalidates these rationalizations for heavy logging.

Early successional habitats have declined in Massachusetts because the forest has recovered from the widespread clearing that occurred in the past. Early successional species levels are unnaturally high due to that clearing and are returning to their natural levels. These species are not endangered. Additionally, due to ongoing disturbances, early successional habitats will never reduce down to the pre-European levels which were small in size and caused by temporary openings created by very rare natural disturbances.



Forest Health? Wildlife Enhancement? Hem Covey WMA

Clear-cutting does not even provide the best habitat for early successional species. It usually results in dense thickets of sapling-size pin cherry, gray birch, white birch and quaking aspen. Clear-cutting and even-aged logging is very destructive to the forest ecosystem (see page 6) and also degrades the habitat for species that require significant areas of un-fragmented and undisturbed forested landscape. The return of the forests has allowed the return of moose, black bear, fisher and eastern coyote among others.



**STATE PROPAGATED MYTH:** *“With young, vibrant, healthy, growth promoted through this plan, the forest will become naturally more efficient at capturing and storing carbon than it is today.”*

**FACT:** In most situations, a no cutting situation that allows the forest to increase in age and size will sequester the most carbon. If there is cutting, minimizing the reduction in carbon sequestration rate requires plans with long rotations, few entries, the use of low-impact logging, and choosing appropriate thinning regimes that concentrate more growth on fewer and larger trees with greater potential carbon storage benefits. “Forests store more carbon as they age due to high levels above and below ground.”<sup>58</sup> The worst situation is to use aggressive harvesting practices which often remove the largest and most valuable trees in one operation. “These harvests destroy much of the future value for wood production, reduce growth rates, damage forest aesthetics, and increase vulnerability to disturbances. These ecologically-degrading poor harvest practices reduce the ability of the forest to accumulate and store carbon for many years.”<sup>59</sup> Sometimes this loss is forever. Although less damaging than heavy logging, even selective logging can reduce the carbon storage capacity of forests.<sup>60</sup>

**STATE PROPAGATED MYTH:** *“Massachusetts forests are somewhat homogenous, with trees of similar ages and species..... The plan will generate young trees.”*

**FACT:** This is an attempt to justify clearcutting and even-aged logging to create mixed aged forests, but most Massachusetts forests already are age-class diverse, possessing seedlings, saplings, pole-size trees and mature trees. The biggest shortfall is old forests, not young forests. The “need” for age-class diversity is a manufactured and false rationalization for even-aged, heavy industrial-type “forestry” and clear-cutting. Even-age logging will **not** create age-class diversity within the forest, hence its name.

**STATE PROPAGATED MYTH:** *“In Massachusetts, foresters are licensed by the state and represent the interests of the forests and the people who own them....Foresters are dedicated to studying and improving the health of our forests”*

**FACT:** Procurement foresters are not in the business of representing the interests of the forests or the people who own them. They work to procure the best possible wood at the cheapest price. Harvesting trees is rarely done for forest health, it is done to obtain timber and make money.

**STATE PROPAGATED MYTH:** *“Forest management plans help sustain healthy, vibrant forests throughout the Commonwealth”*

**FACT:** That human intervention is required to help the forest is false. There are human benefits to harvesting trees, but except in rare circumstances, it is misleading to promote the idea that logging is necessary to benefit nature or “save” the forest. The heavy reliance on even-aged logging at an aggressive pace in the State’s plans promotes timber production over “healthy, vibrant forests” and “conservation and recreation” values.



“Healthy, Vibrant Forests?” Monroe State Forest, Dec 08

**STATE PROPAGATED MYTH:** *“Supplying forest products to support the local economy and employment”*

**FACT:** Some of the loggers currently cutting the trees on State forests are from out of state and most of the logs are shipped to northern New England or Canada.<sup>61</sup> Additionally, the local timber industry has already degraded much of the private forests through a half century of extensive “high grading”, where they have cut the best and left the rest. Many of these private forests no longer have much high quality timber, so industry is turning to public forests to access high quality trees. Importantly, tourism produces 10 times more income than the wood products industry.<sup>62</sup> Cutting over the landscape to add a few more jobs to this now highly mechanized industry threatens the employment and economy of the much more valuable tourism and recreation industries and reduces ecosystem and quality of life benefits.



*“....While there is still room for improvement, we believe our forestry practices are among the best in the nation.”*

DCR Commissioner, Richard Sullivan,  
Worcester Telegram & Gazette,  
Friday, February 13, 2009





## **“GREEN” CERTIFICATION**

Massachusetts has spent millions of taxpayer dollars to qualify for FSC “green” certification of the timber harvesting on State lands.<sup>63</sup> However, instead of protecting these public lands, certification is proving itself to be a timber production program, not a forest protection tool as promised. As a result, Massachusetts citizens are seeing precious public funds spent to encourage aggressive logging of their own lands.

FSC certification allows clear-cutting and the spraying of chemical herbicides. **All of the photos shown in this report are FSC “green certified” logging**, demonstrating that “green certification” may more aptly be called “green washification” since it is being used as a marketing tool to mislead the public and to provide a smokescreen for the aggressive timber harvesting. This certification program is inappropriate for our public lands which are held in trust for ecosystem values for all current and future citizens.



FSC “Green” Certified Logging, Slovakia

A letter from 23 national environmental groups, paraphrased herein and attached in Appendix A, outlines why public lands held for ecosystem values are not appropriate for FSC certification. Public land laws require an open public process to consider the views of a wide variety of stakeholders regarding their management, so the responsible State agencies should not enter into legal contracts with a predetermined disposition toward commercial exploitation. Decisions on the fate of these forests should rest in the hands of the public who owns them.

According to the Massachusetts Constitution, these public lands are to be managed first to provide ecosystem based values such as clean water, clean air, wilderness protection, fish and wildlife habitat, recreation, tourism, spiritual recharge and scenic beauty which should take precedence over commodity extraction opportunities. Forest certification reverses this priority, limiting conservation values to what is commercially viable, and allowing forestry goals to take precedence over the many other important forest values.



FSC “Green” Certified Logging, Massachusetts

The FSC certification process turns over the evaluation of management planning and forestry practices to a third-party which makes local land managers answerable to private certifiers who have a financial interest in certification. The result is a promotion of commercial logging of our public forests with direct and indirect influences restricting and undermining the precedence of conservation values. The Massachusetts 2008 FSC certification audit exemplifies this problem with FSC pushing for more logging, stating ***“Harvest levels on BOF and DFW lands are far too low to ensure that the long-term goals are met”***<sup>64</sup>



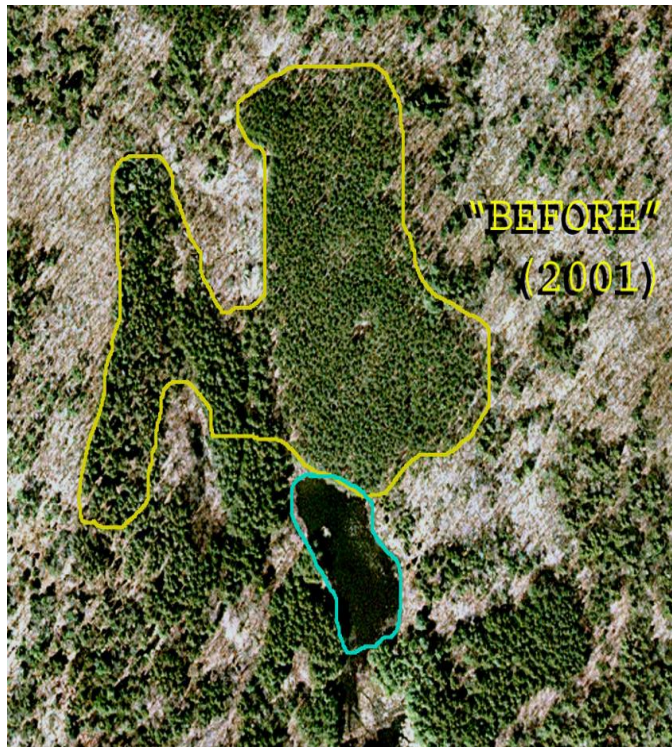
FSC “Green” Certified Logging, Slovakia

In summary, FSC certification is costly, is not protecting our public forests and its timber production goals stand in direct conflict with Massachusetts public land policies that require protection of all the ecosystem values provided by these public forests. More documentation of the failings and problems with FSC certification can be seen in Appendix A and at [www.fsc-watch.org](http://www.fsc-watch.org). We strongly oppose re-certification of Massachusetts public lands and ask the State to end this process before more public forests are cut and resources wasted. We recommend public rulemaking and legislation with strong oversight as the best way to protect these forests and serve the interests of all Massachusetts’ citizens.

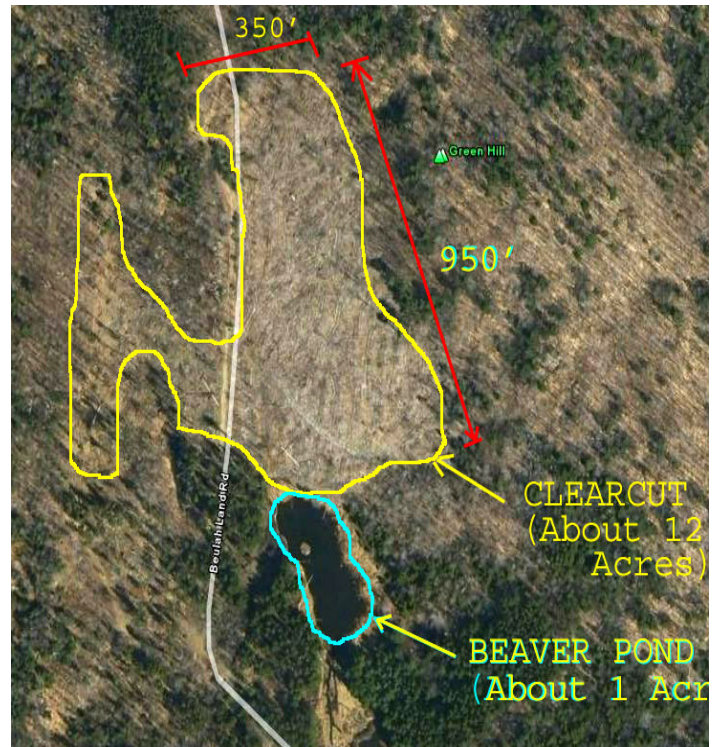


***“Chester-Blandford State Forest offers a rustic park experience and spectacular Sanderson Brook Falls.....try the H. Newman Marsh Memorial Trail featuring a challenging, but rewarding, climb to the top of Observation Hill, with views spanning up and down the wild and scenic Westfield River valley.” DCR Website***

About 2005, a large clear-cut on a steep slope was illegally cut right up to the edge of a long established beaver pond in Chester Blandford State Forest. In August 2008, the beaver dam was breached in a rainstorm and the pond was lost and washed downstream into to the Westfield River. It is likely that the extra runoff from the 2005 clear-cut significantly contributed to the dam breach.



**“BEFORE CLEARCUT”, Aerial View, 2001**



**“AFTER CLEARCUT”, Aerial View, 2005**



**“After Clearcut, Before Breach”, May 2008**



**“After Clearcut and Dam Breach”, Nov, 2008**



## **WHERE ARE THE ENVIRONMENTAL GROUPS?**

Sadly, the state agencies are not the only ones endorsing a drastic increase in heavy cutting of Massachusetts public forests. The leadership of some of the larger environmental groups in Massachusetts, who have historically acted as fierce watchdogs over these vital public forests, have recently endorsed unprecedented commercial logging rates upon them.

The Nature Conservancy, Sierra Club of Massachusetts, the Appalachian Mountain Club, the Massachusetts Audubon Society, and the Environmental League of Massachusetts have all endorsed the district plans outlined earlier that would increase logging levels at least 400% over historical levels on our public lands using 74% “even-aged” management, a.k.a. “clear-cutting and its variants”. Remarkably, these groups gave their approval to these plans before an upcoming public participation process had even begun. On November 5, 2008, after having seen the clear-cut photos, these groups submitted a letter to DCR stating:

***“....We recommend that the Stewardship Council approve the Western Connecticut Valley, Southern Berkshire, and Northern Berkshire Forest Resource Management Plans.... We recommend that the Stewardship Council vote to approve all three completed Forest Resource Management Plans and that DCR move to finish, and the Stewardship Council approve the remaining plans.”***<sup>65</sup>

In return for endorsing these plans which allow for industrial scale timber management of our public forests, the only concessions these groups received from DCR were more clarity in the plans and a nebulous promise to revisit and adjust the plans through adaptive management in the future. But DCR has consistently ignored public input and is the agency pushing the heavy logging, so by giving their endorsement to these management plans, these environmental groups have helped elevate timber production to the primary focus of our public forests. Why would these five groups ever endorse heavy logging on our public lands?



Quabbin Park, 2008

While ultimately, it is their endorsements, positions and actions that provide the best measurement of their values, sometimes it can be useful to follow the funding, leadership backgrounds and connections to help understand what drives decision-making. While these groups were originally formed and run mostly by environmentalists, nowadays, their governing boards may contain many directors with corporate backgrounds and some pay hefty CEO salaries, indicating a possible disconnect from their origins and grassroots supporters. Some of these groups also receive funds from the public agencies cutting the forests. *Even if these funds are used for virtuous causes*, this relationship calls into question their ability to remain independent and critical, essential traits to maintain when the State is using their endorsement to justify the heavy logging of our public forests.

The Washington Post published an article about the **Nature Conservancy** entitled, “*Nonprofit Land Bank Amasses Billions: Charity Builds Assets on Corporate Partnerships*” documenting the close relations between the Nature Conservancy and extractive industries, stating, “*Its governing board and advisory council now include executives and directors from one or more oil companies, chemical producers, mining concerns, auto manufacturers, logging operations and coal-burning electric utilities*”<sup>66</sup> Their chairman of the board is the CEO of a commercial timber company with 100,000 acres of Maine timberlands and is the former chairman of the Maine Forest Products council, the principle lobbying group for the forest products industry in Maine.<sup>67</sup> Their CEO is paid a \$427,000 salary, and was an investment banker from Goldman Sachs.<sup>68</sup> The Nature Conservancy sits on the board of directors of the FSC “green” certification company.<sup>69</sup>

The president of the **Massachusetts Audubon Society** was with the Nature Conservancy for 16 years where she served as a Vice President and Regional Director before moving to Audubon.<sup>70</sup> The board of directors at MA Audubon includes executives from a global investment management firm, a national real estate investment company, a corporate law firm, an international bank, a global marketing and sales corporation and a venture capital firm among others.<sup>71</sup>



A public records request revealed \$2,102,500 in payments to Mass Audubon from the DCR since 2004 for co-managing a museum, lecturers, research, wildlife programs and monitoring, performances, grants, etc. and \$1,319,500 for land purchases and property management.<sup>72</sup> While these funds may go towards valuable work, the question arises whether Audubon is able to maintain independence when endorsing DCR policies. This question is particularly important because the president of Audubon sits on the Stewardship Council which oversees the DCR forestry policies, and gains urgency when Audubon endorses unprecedented levels of heavy logging on our public lands, without even visiting the cutover areas of our State forests and parks.

The president of the **Appalachian Mountain Club** (AMC) was a senior executive at Wellington Management, a global investment firm before joining the AMC.<sup>73</sup> In 2007, their executive director received a \$304,000 salary.<sup>74</sup> Their vice-president, a real-estate and construction company executive, currently teaches real estate development courses.<sup>75</sup> Disturbingly, when the Wilderness Society and the **National Sierra Club** filed suit to stop clear-cutting of a roadless area in the White Mountain National Forest, the **Appalachian Mountain Club sided with the timber industry to allow the clear-cutting.**<sup>76</sup>

**The Sierra Club** is a founding member of the FSC certification program and FSC is in a heated competition with the industry sponsored, even less credible, “SFI” certification program.<sup>77</sup> The FSC program needs a steady wood supply to compete with SFI, and unfortunately this may have helped land Massachusetts State forests on the chopping block. Importantly, 23 major environmental groups, including the **National Sierra Club**, are against FSC certification of “public lands held predominantly for preservation and ecological restoration”. (See Appendix A) Additionally, the national Sierra Club supports an “end to all commercial logging” on National forests yet the State chapter is endorsing heavy logging of our State forests.<sup>78</sup>

Many attempts have been made to communicate the negative ecological impacts occurring from the logging to the leadership of these groups, particularly the Audubon Society, Appalachian Mountain Club and Sierra Club. When questioned why they are endorsing the aggressive logging plans and not responding to illegal logging, these groups either evade the issue or fall silent.

In a further effort to reach out to these groups, a signature verified certified letter was sent to the Sierra Club of Massachusetts, the Audubon Society of Massachusetts and the Appalachian Mountain Club asking: *“Do you oppose the current clear-cutting and aggressive logging occurring on Massachusetts public forests? Would you endorse and work for minimal timber harvesting rates similar to historical levels along with single tree selective logging methods?”* None of these groups would respond to this question despite a more than four month time period and repeated follow-up contact attempts.



“Tree Huggers” endorsing this future? Conway SF, 2008

While fully recognizing their earlier advocacy days, the high public esteem in which these groups are held only increases the damage caused by their endorsement of destructive State management plans. The urgent threat to our forests necessitates exposing these facts, especially to their members and to the public who have trusted that they were, if not winning, at least fighting to save our public forests from the chainsaw. **These groups do not even alert their members about the aggressive public land logging on their websites.**

We can hope, and look forward to the day when these groups return to their roots, but as it stands now, concerned citizens working to save forests and parks need to realize that they cannot rely upon these five environmental groups to defend Massachusetts’ important public forests. Incredibly, to the contrary, with their endorsement of the State’s management plans, these groups themselves have helped foster drastic logging increases and heavy handed cutting methods in these public forests that belong to us all.



## **ILLEGAL LOGGING**

The DCR and DFW are not adhering to existing laws designed to help protect our forests. Even though the agencies will present a litany of arbitrary excuses, close examination uncovers widespread illegal State Forest logging, including some examples shown below.

**Department of Fish and Wildlife, MGL Chapter 131: Section 4: Part 16:**

**“.....it shall be a condition of each contract for the cutting and sale of timber that **clear-cutting timber on lands managed by the division is specifically prohibited.**”**



9 Acre Clear-cut - Peru Wildlife Management Area, Middlefield Road, 2007



28 Acre Clear-cut from the Air-Fox Den Wildlife Mgmt Area, Chipman Rd, 2008

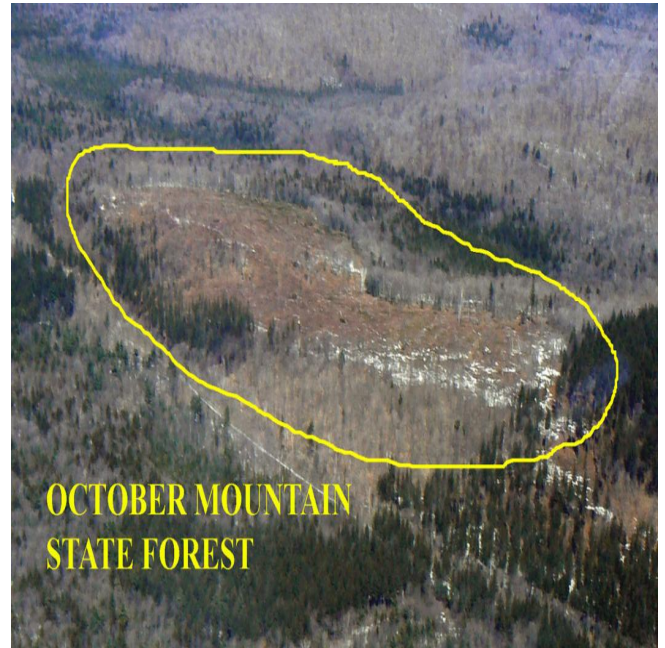


**Department of Conservation and Recreation, M.G.L. c. 132, 304 CMR 11.05(1)(a) 2a**

“Clear-cutting, coppice cuts, or any regeneration cut leaving less mature trees than those required for a seed tree cut...the maximum size of the opening created shall be 10 acres unless the source of the regeneration is seeding from surrounding stands, in which case the maximum size shall be 5 acres.”



15 Acre Clear-cut – Savoy State Forest, 2008



50 Acre Clear-cut From the Air–Oct Mtn SF, 2008

**Department of Conservation and Recreation, M.G.L. c. 132, 304 CMR 11.05(1)(d)**

“Filter strips shall be left along the edges of all water bodies and Certified Vernal Pools. No more than 50% of the basal area shall be cut at any one time and a waiting period of five years must elapse before another cut is made. The residual stand shall be composed of healthy growing trees well distributed over the area.”



Clearcut to Edge of Pond–99% Basal Area Removed– Chester Blandford State forest, Beulah Land Rd, 2008



**For more Massachusetts public land logging photos see: [www.maforests.org](http://www.maforests.org)**



## **RECOMMENDATIONS**

In order to protect our vital forests, improve air quality, reduce carbon dioxide emissions and save scarce taxpayer funds, Massachusetts Forest Watch calls for the following actions:

**Whereas:** Public forests are actively being recklessly cut thus potentially causing irreversible damage while the future management of these critical lands is currently being debated.

**Solution:** **An immediate statewide moratorium, without loopholes, on commercial logging on state owned public forests to allow for the necessary time to develop well thought out plans that will manage these forests for the long term good of the public who owns them.**

\*\*\*\*\*

**Whereas:** FSC “Green” certification allows clear-cutting and the use of chemical herbicides, promotes industrial scale logging inappropriate for our public lands and spends valuable taxpayer funds.

**Solution:** **Cancel the FSC green certification program, replace it with rulemaking and legislation to protect these vital forests.**

\*\*\*\*\*

**Whereas:** State forests represent only 10% of the land area, and 16% of the forests in Massachusetts and are our best chance for preserving wildness and perpetually functioning ecosystems in such a densely populated state.

**Whereas:** The timber program costs more than it makes, taxpayers are paying to cut their own forests.

**Whereas:** Employment in the timber industry is less than 1%, even in the most timber extractive regions and the logs are mostly sent out of state.

**Whereas:** Tourist and recreation industries depend heavily on attractive and peaceful public forests.

**Whereas:** Public sentiment readings indicate that the public would overwhelmingly vote for no commercial timber harvesting on public lands.

**Whereas:** Massachusetts has the chance to be a progressive leader in forest protection.

**Whereas:** It is critical to avoid valid claims of hypocrisy when admonishing poor third world countries to set aside their forests in reserves.

**Whereas:** Private lands (about 80% of Massachusetts forests) can provide wood products while minimizing ecological damage by using mostly selective and un-even aged management.

**Whereas:** Our atmosphere is already overloaded with CO2 and literally threatens life on this planet. Allowing our public forests to continue growing and soaking up CO2 is one of the best things we can do to show we really care about the future for our children.

**Solution:** **Prohibit, or severely restrict, commercial logging on State owned forests and parks.**

\*\*\*\*\*

**Whereas:** New biomass power plants using whole trees or contaminated waste and ethanol derived from trees would add to air and water pollution, increase Massachusetts CO2 emissions, severely degrade our public and private forests and cynically squander clean energy subsidies.

**Solution:** **Stop permitting new biomass power plants and remove whole tree wood chips and contaminated waste such as chemically contaminated construction and demolition waste, municipal solid waste, and waste pallets from eligibility to receive subsidies or advancement from taxpayers, electricity rate-payers, or agents of the Commonwealth through the Renewable Portfolio Standard or any other laws, regulations, statutes, promotions or practices. Re-direct these subsidies and incentives toward truly green technologies to produce clean, non-carbon emitting energy and conservation local jobs.**

\*\*\*\*\*



## **SUMMARY**

The fate of Massachusetts forests is truly at a crossroads.

Historically, the public forests in Massachusetts have been harvested at a calm pace. These public lands in combination with large tracts of forested private lands have maintained enough forest cover to support the return of wildlife populations, a cleaner environment and a high quality of life for Massachusetts' citizens. The presence of species including bear, moose, eagles and others in such a densely populated state is a testament to one of the bigger environmental recovery stories in the world and is mostly attributable to the existence of this forest in Massachusetts and throughout New England.

Massachusetts is known worldwide for its beautiful forests and bucolic landscapes, and visitors come from around the world to see the trees and their spectacular fall display. Very few, if any, places in the world can compete with our combination of history and culture with relatively intact natural surroundings. Unfortunately, there is a wolf at the door threatening this hard earned high quality of life. While it may be hard to recognize now, these natural treasures and our high quality of life are very much at risk from the Patrick Administration's proposals, policies and actions outlined in the preceding pages.



Quabbin Reservoir

Economically speaking, non-extractive benefits of our forests far outweigh timber receipts. Tourism is a \$14 billion dollar industry in Massachusetts, with 22 million annual visitors.<sup>79</sup> The MA office of travel and tourism estimates that non-residents of Massachusetts contribute \$10 billion to the state's economy for activities related to forests and the outdoors while wood products generate less than \$1 billion.<sup>80</sup> Ecosystem services, including freshwater supply, biodiversity, aesthetics, stormwater mitigation, nutrient regulation, soil retention, and climate control, are valued at nearly \$3 billion.<sup>81</sup> Additionally, carbon sequestration benefits have yet to be fully quantified. It is illogical to threaten these important, non-extractive industries and economic benefits just to boost the timber industry.



Mt. Holyoke Range State Park

Unfortunately, we seem to be taking these beautiful and important forests for granted, and if we don't act soon we may lose many of the above mentioned benefits to satisfy the timber industry and doom ourselves to a return to the historical "bitter past"<sup>82</sup> of aggressive timber harvesting. This future scenario is a quite plausible under the proposals being put forward, and it is probably not a living environment most Massachusetts citizens would like to live in. This is a world where large logging trucks plow up and down small rural roads, clear-cuts spread across the landscape and where one cannot look at a beautiful forest without wondering when the axe will fall.



Proponents of this return to heavy logging use the “sustainability” buzzword, but sustainability of what? Sustainable forestry refers to the continuing production of timber products from a forest. It does not account for the sustainability of non-extractive values such as wilderness, old growth, wildlife habitat, recreation, clean water, clean air, tourism, spiritual recharge, scenic beauty and all the other non-timber values which we receive from forests.



Skinner Mountain State Park

In addition, we call on the Legislature and Governor Patrick to stop the permitting of new biomass energy projects and to remove whole trees or chemically contaminated construction and demolition waste, municipal solid waste, and waste pallets from eligibility to receive subsidies or advancement from taxpayers, electricity rate-payers, or any agents of the Commonwealth through the Renewable Portfolio Standard or any other laws, regulations, statutes, promotions or practices. These tax-payer subsidies and other incentives should be redirected toward truly green technologies to produce clean, non-carbon emitting energy, and local jobs.

At this time of ecological and economic crisis, there is no reasonable argument for forcing taxpayers to subsidize new polluting private power plants for minimal amounts of cheap power. Nor should our state agencies charged with protecting our environment be encouraging and subsidizing the aggressive cutting of our priceless forests, particular under the cynical guise of “green” certification. These policies will worsen air pollution, increase greenhouse gas emissions, deplete forests and drain our public coffers, the exact opposite of what we need to be doing right now.

The fate of Massachusetts forests is at a crossroads. The threat is real, the choice belongs to all of us....

**Please Choose Carefully**

Additionally, the damage we see occurring now on our public lands is the model the State would like to see used for management of all Massachusetts forests, public and private, therefore it is imperative we stop this exploitation of the people’s lands now, before it is too late. Once the infrastructure is built to accommodate such large quantities of cutting and burning of our forests, it will be difficult, if not impossible to put the brakes on, even when the negative impacts become obvious.

To this end, we call on the Legislature and Governor Patrick to enact an indefinite moratorium on commercial logging in Massachusetts State forests to allow for the necessary time to develop well thought out and inclusive plans for these public lands. Any plan must ensure a healthy future for our environment and communities by recognizing and protecting all the important non-timber values provided by forests. Serving the long-term public interest should be the sole criteria for deciding how these public lands should be managed, and how much, if any, commercial timber harvesting should occur.



Mt Greylock from Savoy State Forest



Beautiful, Non-threatening, Norway Spruce, Savoy SF



## Footnotes

- 1 Office of Energy and Environmental Affairs, "One end result of Green Certification is the identification of "forest reserves" on approximately 20% state land where commercial harvesting will not occur. State forestland that is not within a reserve (approximately 80% of state forestland) will remain open to sustainable harvesting of renewable wood products."
- 2 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf) p 151, Peer Review Comments from FSC Certification Report for Management of MA Forests 2/22/05. William M. Healy, "If there were a statewide ballot referendum tomorrow asking if timber cutting should be allowed on state forests, the "no" votes would win handily."
- 3 See district plan summaries, Even-aged: CBD 20,840 of 23,040 acres, SBD 27,753 of 31,753 acres, WCV 10,256 of 19,836, NBD 17,791 of 28,616 acres →  $(20840+27753+10256+17791)/(23040+31753+19836+28616) = 0.74$
- 4 [www.saveamericasforests.org/resources/Scientists.htm](http://www.saveamericasforests.org/resources/Scientists.htm)
- 5 [www.mass.gov/dcr/stewardship/forestry/manage/docs/cbk\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/cbk_resourceManagement.pdf) p 69-70  
Note: Total volume converted to MBF, (1 MBF = 2.0 cords), i.e  $597 + 439/2 = 817$  mbf
- 6 [www.mass.gov/dcr/stewardship/forestry/manage/docs/cbk\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/cbk_resourceManagement.pdf) p 4
- 7 [www.mass.gov/dcr/stewardship/forestry/manage/docs/sbd\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/sbd_resourceManagement.pdf) p 88-89  
Note: Total volume converted to MBF, (1 MBF = 2.0 cords)
- 8 [www.mass.gov/dcr/stewardship/forestry/manage/docs/sbd\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/sbd_resourceManagement.pdf) p 64
- 9 [www.mass.gov/dcr/stewardship/forestry/manage/docs/wcv\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/wcv_resourceManagement.pdf) p 87-88  
Note: Total volume converted to MBF, (1 MBF = 2.0 cords)
- 10 [www.mass.gov/dcr/stewardship/forestry/manage/docs/wcv\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/wcv_resourceManagement.pdf) p 63
- 11 [http://devalpatrick.com/issue.php?issue\\_id=7577164](http://devalpatrick.com/issue.php?issue_id=7577164)
- 12 [www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd_resourceManagement.pdf) p 88-89  
Note: Total volume converted to MBF, (1 MBF = 2.0 cords)
- 13 [www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd_resourceManagement.pdf) p 64
- 14 Historical and proposed data provided by John Scanlon, chief forester at DFW
- 15 [www.mass.gov/dfwele/dfw/habitat/management/bdi/forest\\_mgt/pdf/tmmv\\_fmz.pdf](http://www.mass.gov/dfwele/dfw/habitat/management/bdi/forest_mgt/pdf/tmmv_fmz.pdf) p 22
- 16 [www.mass.gov/dfwele/dfw/habitat/management/bdi/forest\\_mgt/pdf/bh\\_fmz.pdf](http://www.mass.gov/dfwele/dfw/habitat/management/bdi/forest_mgt/pdf/bh_fmz.pdf) p 23
- 17 [www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd\\_resourceManagement.pdf](http://www.mass.gov/dcr/stewardship/forestry/manage/docs/nbd_resourceManagement.pdf)  
Income= \$590,000 at Maximum ceiling cutting level of 1007 acres  
→ Income at "Recommended" and "Committed" level of 450 acres=  $\$590,000 \times 450 / 1007 = \$264,000$  (p 90)  
Costs = \$233,000 (Operating Costs) + \$175,000 (Road Maintenance and Boundary Surveying)= \$408,000 (p 91)
- 18 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf) p 6 \$1.2 million & Bob O'Connor, EOEEA, "\$2 million invested", Dec 06
- 19 [www.massvacation.com/research/#aOverview](http://www.massvacation.com/research/#aOverview)
- 20 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf) p 27
- 21 [www.wpi.edu/Pubs/E-project/Available/E-project-042408-122534/unrestricted/April\\_24\\_draft.pdf](http://www.wpi.edu/Pubs/E-project/Available/E-project-042408-122534/unrestricted/April_24_draft.pdf) p 6
- 22 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf) p 27
- 23 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf) p 105
- 24 [www.forestguild.org/publications/research/2007/ForestGuild\\_climate\\_carbon\\_forests.pdf](http://www.forestguild.org/publications/research/2007/ForestGuild_climate_carbon_forests.pdf) p 27
- 25 [www.mass.gov/dfwele/dfw/habitat/grants/lip/pdf/lip\\_newsletter.pdf](http://www.mass.gov/dfwele/dfw/habitat/grants/lip/pdf/lip_newsletter.pdf) p 1
- 26 [www.mapension.com/Publications/Annual/PRITCAFR2008.pdf](http://www.mapension.com/Publications/Annual/PRITCAFR2008.pdf) p 93
- 27 [www.scs-certified.com/PDFS/forest\\_mass.pdf](http://www.scs-certified.com/PDFS/forest_mass.pdf), cover page
- 28 [www.masstech.org/project\\_list.cfm?init=40](http://www.masstech.org/project_list.cfm?init=40), [www.recorder.com/story.cfm?id\\_no=5676106](http://www.recorder.com/story.cfm?id_no=5676106),  
[www.wbjournal.com/news41145.html](http://www.wbjournal.com/news41145.html)  
Greenfield (50 MW), Russell (50 MW), Springfield (30 MW), Pittsfield (30-50 MW), Fitchburg (15 MW) = 185 MW
- 29 Biomass Data ([www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-08-02-28-wmass-assess.pdf](http://www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-08-02-28-wmass-assess.pdf))  
Page 11 - 13,000 green tons per year = 1 MW generating capacity  
→ Total Wood required = 185 MW x 13,000 tons = 2.4 million tons  
CO<sub>2</sub> produced per ton of wood burned = 1.25 tons/ton Russell ENF p 12  
→ Total annual CO<sub>2</sub> = 1.25 tons/ton x 2.4 million tons = 3.0 million tons



## Footnotes (Continued)

- 30 Biomass Data ([www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-08-02-28-wmass-assess.pdf](http://www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-08-02-28-wmass-assess.pdf))  
Page 11 - 13,000 green tons per year = 1 MW generating capacity  
Page 13 - Branches and tops add 0.29 tons for each ton of merchantable stems  
Page 31 - Total Residue Available = 0.63 million green tons all western MA including Worcester County  
NOTE: the reality of this number includes C&D waste (see page 25) and is likely to be significantly smaller as it does not account for reductions due to less land clearing due to the housing market correction, reduced timber residues due to the depressed industry conditions, or the removal of toxic C&D waste. Availability of out of state sources excluded due to their own demands from their own proposed biomass projects.  
Existing wood cut on MA forests, 2005 Stakeholder Report ([www.mass.gov/dcr/stewardship/forestry/](http://www.mass.gov/dcr/stewardship/forestry/))  
Total public and private forest acres in Massachusetts = 3.1 million acres (Page 1)  
Private Forests 5 year Average Annual Harvest (Page 10), 27,561 acres, 62,604 mbf, 44,806 Cords, 20,088 tons  
Convert to tons, 1 cord = 2.5 green tons chips, 1 mbf = 5.0 tons (1 mbf = 2 cords)  
→ 62,604(5.0)+44,806(2.5)+20,088 = 442,123 tons x 1.29 (branches and tops) = 0.57 million tons  
Public Forests 2001-2005 Average Annual Harvest (Page 15), 1,417 acres, 5487 mbf, 3757 Cords, 2425 tons  
Convert to tons, 1 cord = 2.5 green tons chips, 1 mbf = 5.0 tons (1 mbf = 2 cords)  
→ 5487(5.0)+3757(2.5)+2425 = 39,253 tons x 1.29 (branches and tops) = 0.05 million tons  
→ 0.57 million tons private + 0.05 million tons public = 0.62 million tons current total harvest  
Note: DCR cutting is reported for logging projects over 25 mbf or 50 cords. Small projects are not reported and are difficult to ascertain quantities, but are estimated at about 25-50% of reported quantities according to industry representatives. Split the difference, add 37.5% to this quantity for small projects = 0.62\*1.375 = 0.85 million tons  
Total five plant Biomass Wood required = 185 MW x 13,000 tons = 2.4 million tons  
Wood required from forests after subtracting available waste wood = 2.4 mil tons - .63 mil tons = 1.77 mil tons  
Avg weight for trees too small for sawlogs = 434 lbs → 1,770,000 tons x 2000 lbs / 434 lbs = 8,156,682 trees  
[www.fs.fed.us/ne/newtown\\_square/publications/research\\_papers/pdfs/scanned/OCR/ne\\_rp366.pdf](http://www.fs.fed.us/ne/newtown_square/publications/research_papers/pdfs/scanned/OCR/ne_rp366.pdf) p 2  
Total proposed required harvest = (1.77 + 0.85)/0.85 = 3.08 times current rate  
Total annual acreage cut at 3.08 times current rate = 3.08 x 1.375 x (27,561+1,417) = 122,721 acres per year  
Years to log all Massachusetts forests = 3,100,000 acres / 122,721 acres/year = 25 years  
Truck Trips = 2.4 mil tons / 26 tons per trip x 2 (2-way) = 184,615 [www.fs.fed.us/rm/pubs/rmrs\\_rm020\\_02.pdf](http://www.fs.fed.us/rm/pubs/rmrs_rm020_02.pdf)  
Trips per day (6 working days per week) = 184,615 / (52\*6) = 592, some trucks are not fully loaded, say 600  
31 [www.timberbuysell.com/Community/DisplayNews.asp?id=3638](http://www.timberbuysell.com/Community/DisplayNews.asp?id=3638)  
32 [www.mass.gov/dcr/stewardship/forestry/utilmark/index.htm](http://www.mass.gov/dcr/stewardship/forestry/utilmark/index.htm)  
33 [www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-silviculture.pdf](http://www.mass.gov/Eoeea/docs/doer/renewables/biomass/bio-silviculture.pdf)  
Forest Biomass Harvesting-Silvicultural and Ecological Considerations, p 4, 5 & 63  
34 [www.mass.gov/Eoeea/docs/doer/gca/class2/massaudubonreplyrps2.pdf](http://www.mass.gov/Eoeea/docs/doer/gca/class2/massaudubonreplyrps2.pdf) p 3  
35 [www.biomass.forestguild.org/Case-Studies/1035.html](http://www.biomass.forestguild.org/Case-Studies/1035.html)  
36 [www.mass.gov/legis/bills/house/185/ht04pdf/ht04373.pdf](http://www.mass.gov/legis/bills/house/185/ht04pdf/ht04373.pdf) p 85  
37 [www.wpi.edu/Pubs/E-project/Available/E-project-042408-122534/unrestricted/April\\_24\\_draft.pdf](http://www.wpi.edu/Pubs/E-project/Available/E-project-042408-122534/unrestricted/April_24_draft.pdf)  
38 <http://news-service.stanford.edu/news/2009/january7/power-010709.html>  
39 [www.boston.com/news/local/massachusetts/articles/2009/02/11/umass\\_employees\\_top\\_list\\_of\\_highest\\_paid\\_state\\_workers/](http://www.boston.com/news/local/massachusetts/articles/2009/02/11/umass_employees_top_list_of_highest_paid_state_workers/)  
40 [www.eia.doe.gov/cneaf/electricity/st\\_profiles/e\\_profiles\\_sum.html](http://www.eia.doe.gov/cneaf/electricity/st_profiles/e_profiles_sum.html) Existing capacity = 13,932 MW + new, say 14,000  
41 <http://sustainable.cchrc-research.org/2008/07/dont-let-phantom-power-haunt-your-home/>  
42 [www.aceee.org/energy/eemra/eeassess.htm](http://www.aceee.org/energy/eemra/eeassess.htm)  
43 [www.mass.gov/Eoeea/docs/doer/pub\\_info/giudice-enr-testimony-feb-26-2009.pdf](http://www.mass.gov/Eoeea/docs/doer/pub_info/giudice-enr-testimony-feb-26-2009.pdf) p 2  
44 [www.eia.doe.gov/cneaf/electricity/epa/epat5p1.html](http://www.eia.doe.gov/cneaf/electricity/epa/epat5p1.html) U.S. Electric Power Indust. Estimated Emissions by State (EIA-767 and EIA-906)  
2006 Emissions = 23,707,577 metric tons x 1.1 = 26,078,000 tons → 3,000,000 tons new / 26,078,000 = 11.5%  
45 Tighe & Bond. 2005. Expanded Environmental Notification Form, Russell Biomass Project, September 2005. p. 3, 12  
600,000 CO2 tons per year, 380,000 MWhr per year, 600,000 x 2000 lbs/ton / 380,000 = 3,158 lbsCO2 per MWhr  
46 Massachusetts Public Interest Research Group. 2005. "More Heat than Light." p 1  
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**For more Massachusetts public land logging photos and video, and  
to join our forest protection efforts, see: [www.maforests.org](http://www.maforests.org)**

**MASSACHUSETTS   FOREST WATCH**

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have been literally putting their lives into saving one piece of paradise upon this earth.  
[www.concernedcitizensofrussell.org/](http://www.concernedcitizensofrussell.org/) Contact: Jana Chicoine, [janachicoine@verizon.net](mailto:janachicoine@verizon.net)**



## **APPENDIX A**

### **Letter from 23 Major National Environmental Groups Opposing FSC “Green” Certification of National Forests and Public Lands Held For Ecosystem and Ecological Values**

**Allegheny Defense Project \* American Lands Alliance \* Bark \* Center for Biological Diversity \* Cherokee Forest Voices \* The Clinch Coalition \* Dogwood Alliance \* Habitat Education Center \* Heartwood \* Klamath-Siskiyou Wildlands Center \* The Lands Council \* Natural Resources Defense Council \* Oregon Wild \* Sierra Forest Legacy \* Pacific Rivers Council \* Sierra Club \* Siskiyou Project \* Southern Appalachian Forest Coalition\* Western North Carolina Alliance \* Wild Earth Guardians \* Wild South \*The Wilderness Society \* WildWest Institute**

October 1, 2008  
Gail Kimbell, Chief, United States Forest Service  
Doug W. MacCleery, Forest Management  
USDA Forest Service  
201 14<sup>th</sup> Street, SW  
Mailstop: 1103  
Washington, DC 20024

Dear Chief Kimbell and Doug MacCleery:

The undersigned organizations are writing to express our concerns regarding the U.S. Forest Service’s proposal to consider seeking certification of our National Forest System lands.

We believe forest certification is ill-suited to our nation’s federal forest lands. National forests (and similar lands managed by the Bureau of Land Management) belong to all Americans and are held in trust by the federal government for the benefit of the public. We believe these lands should be managed first to provide for those values and resources not adequately secured in the private market place and on the rest of the forest landscape. Clean and plentiful drinking water, habitat for wildlife and fish, and a haven for world class recreation opportunities should take precedence over commodity extraction opportunities. Our national forests are not simply ours to exploit: they are a legacy for generations to come. Because of the scale of development these lands have experienced to date, with more than half already open to extractive industries, it is essential that conservation of their residual natural values be considered first priority so that future generations of Americans can enjoy their benefits.

Forest certification, however, reverses this priority, limiting conservation values to what is commercially viable. Certification is, by the Pinchot Institute for Forest Conservation’s definition, a “market-based, non-regulatory forest management tool designed to recognize and promote environmentally-responsible forestry and sustainability of forest resources.”<sup>1</sup> Additionally, “the certification process involves an evaluation of management planning and forestry practices by a third-party according to an agreed-upon set of standards.”<sup>2</sup> This would make federal land managers answerable to certifiers, who are guided by the standards, but who also have a financial interest in certification. The result would be promotion of commercial logging on national forests, with direct and indirect influences restricting the precedence given to conservation considerations. Certification is a system that promotes conservation on lands, private and state owned, which are already primarily dedicated to logging and whose managers have chosen to participate in certification. Applying certification to federal forests though would tend to cap or undermine conservation efforts on those

<sup>1</sup> Pinchot Institute for Forest Conservation. “Certification: Definition and Background.” <http://www.pinchot.org/project/59>

<sup>2</sup> Pinchot Institute for Forest Conservation. <http://www.pinchot.org/project/59>



public forests where no such commercial imperative exists, to the detriment of efforts to give greater preference to biological diversity, ecological restoration, and recreation.

While many of our organizations support the Forest Stewardship Council (FSC)-US as an independent third party for a forest certification system on non-federal forest lands, the FSC-US regional standards were not designed for certifying tracts of public lands held predominantly for preservation and ecological restoration. Therefore, while we recognize the benefits and success of forest certification systems on non-federal lands, we have concluded that forest certification should not be applied to the management of National Forest System lands.

Inadequacies in the current federal procedures and laws that govern these lands are best dealt with through public rulemakings and legislation. Since the Forest Service desires to improve its own forest management and views some FSC provisions as an improvement over its own current practices, the Forest Service should take the FSC requirements that are more stringent than federal laws and regulations and propose these requirements as new regulations in a public rulemaking process. This might truly improve federal forest management without the pitfalls associated with formal certification.

### *Federal Public Land Policies Conflict with FSC Systems*

There are fundamental conflicts between federal public land policies and the FSC's processes and requirements. For example, U.S. federal laws require an open public process to consider the views of a wide variety of stakeholders regarding the management of National Forest System lands. Uses and standards must be periodically re-examined, in part to accommodate changing views and preferences from the forests' actual owners, the public. The Forest Service cannot legally go into such processes with a thumb already on the scales, favoring one approach over another. The FSC, however, not only requires that managers favor one outcome over another, it requires an outright, predictable commitment to specific long-term management plans, that is inconsistent with this federal mandate.

The effort underway to connect the FSC "brand" to U.S. Forest Service lands also contradicts current FSC-US policy. The FSC-US policy of March 2002 states that "barriers to certification are numerous" on federal lands. Among those barriers on national forests are:

- 1) the lack of public consensus about Forest Service management policies;
- 2) the unpredictable nature of Forest Service management practices; and
- 3) strong disagreement among FSC stakeholders regarding certification.

Furthermore, the FSC's Federal Lands Policy precludes certification of most federally-owned forest lands in the United States, including national forests, until three pre-conditions are met:

- 1) the federal agency is willing to certify federal lands;
- 2) there is public consensus how federal lands should be managed; and
- 3) national-level indicators are agreed upon that address the special resource management, legal, technical, procedural, and governance issues surrounding the federal ownership type in question.

The policy also stipulates that if such barriers were overcome, certification on national forests would only proceed after development of appropriate FSC standards that address both unique legal and procedural issues, and the higher burden of responsibility to protect public trust values (such as clean water, biodiversity, climate, recreation, etc.) on federally-owned public lands as distinct from privately held lands.<sup>3</sup>



## *U.S. Forest Service's Record Does Not Warrant Certification*

Additionally, and very regrettably, the Forest Service's record in regards to following and abiding by federal procedures and laws disqualifies it from any market premium predicated on demonstrated stewardship. This is evinced by the large number of cases brought by a variety of stakeholders, including conservationists, where U.S. federal courts have found that the agency acted in violation of various federal laws. Additionally, through little publicized bureaucratic and administrative procedures, the agency has sought to waive or water down environmental laws, to limit public involvement, and to increase its own discretion to allow for commodity uses of our national forests. This includes straight-jacketing public appeals, trying to eliminate the wildlife viability requirement and other meaningful protections in forest planning rules, seeking exemptions from the National Environmental Policy Act (NEPA), refusing to defend against anti-environmental lawsuits, downgrading the Sierra Nevada Framework and the Eastside Screens, attacking the Roadless Area Conservation Rule (including ostensibly exempting the Tongass National Forest from its protections), short-cutting environmental review of oil and gas drilling in the Allegheny National Forest, and pursuing rulemakings that would allow increased coal, oil and gas development in the backcountry lands of the Rocky Mountain West, among many other sad examples. Until this track record is far in the past, any talk of certification will smack of greenwashing.

## *Sustainable Forestry Initiative and Pinchot Institute for Forest Conservation's National Forest Certification Study*

The Sustainable Forestry Initiative (SFI) and other Programme for the Endorsement of Forest Certification Schemes (PEFC) endorsed systems would be particularly inadequate measures of the Forest Service's management of our national forests. The SFI supports a variety of harmful practices, which include large-scale clearcutting, logging of old-growth and endangered forests, and converting forests to ecologically degraded tree plantations.<sup>4</sup> Therefore, the SFI's standards are far below current federal laws directing the management of the National Forest System and are wholly inadequate in every sense for use there.

Additionally, in 2007, the Pinchot Institute for Forest Conservation with the participation of the Forest Service completed the first in a series of studies examining management practices on a small set (five) of national forests in the National Forest System and provided its findings and recommendations regarding certification. The Institute's findings would endorse guidelines that are far inferior to current federal laws.<sup>5</sup> This study in no way makes a convincing case for certification of national forests.

## *Conclusion*

We strongly oppose national forest certification and ask the Forest Service to end the process of considering it before more time and resources are wasted. We consider the appropriate vehicle for ensuring proper management of national forests to be federal procedures and laws and believe certification of these public lands will not serve the interests of Americans.

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<sup>3</sup> Forest Stewardship Council. "FSC-US Federal Lands Policy." Based on "Recommendations of the FSC-US Federal Lands Committee and the FSC-US Board Motion of March 5, 2002" as modified by FSC-US Board action of 2/25/03. [http://www.fscus.org/images/documents/revised\\_fed\\_land\\_pdfs/FL\\_Policy\\_Final.pdf](http://www.fscus.org/images/documents/revised_fed_land_pdfs/FL_Policy_Final.pdf)

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<sup>5</sup> Pinchot Institute for Forest Conservation. "National Forest Certification Study" [http://www.pinchot.org/current\\_projects/forest\\_cert/certification](http://www.pinchot.org/current_projects/forest_cert/certification)

As noted above, more than half of our National Forest Systems lands are already open to commodity development. We cannot afford further management that promotes commoditization of national lands to the detriment of the ecosystem services and other natural values that they uniquely provide and that Americans prize.

Sincerely,

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Allegheny Defense Project  
Pittsburgh, PA

Randi Spivak, Executive Director  
American Lands Alliance  
Washington, DC

Alex P. Brown, Executive Director  
Bark  
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Todd Schulke, Senior Policy Advisor  
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Catherine Murray, Director  
Cherokee Forest Voices  
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Sally Collins, Associate Chief of the U.S. Forest Service  
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FSC-US Board and Staff Members