

MASSACHUSETTS STATE PUBLIC FORESTS

*The Need for Permanent Legal Protection as State Forest
and Wildlife Management Area Clearcutting Continues*





Massachusetts State Public Forests CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA

“Before” 2014

Google Earth Images

“After” 2019



Massachusetts State Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Ground Photos, March 2020



Massachusetts State Public Forests CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA

MGL Ch 131 Sect 4-16: *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



Executive Summary

Most citizens believe that the green areas on maps locate beautiful and fully protected public natural areas. They are mistaken. Logging, including much clearcutting, routinely and increasingly occurs on Massachusetts State public forests, municipal watershed “protection” forests and private “conservation” areas and the logs are mostly sent to Northern New England and Quebec. On State land and municipal watersheds, logging is usually “below cost”¹ meaning taxpayer funds and ratepayer fees that could otherwise support crucial public services are spent to cut down public forests and truck the wood to Canada.

The green areas on the map below show all State public lands (parks, reserves, woodlands, watershed and wildlife management areas), municipal watershed protection forests and private conservation areas in Massachusetts. Even on this small fraction of land, **almost no forests are legally and permanently protected from logging.**

The portion of green areas held in State public forests account for 12% of Massachusetts land area and 19% of its forests. Logging is currently allowed on 64% of these State public forests which means only 4% of Massachusetts land area and 7% of its forests are (in theory) protected in State public forests.² However, even this small amount could be opened to logging with the stroke of the pen.

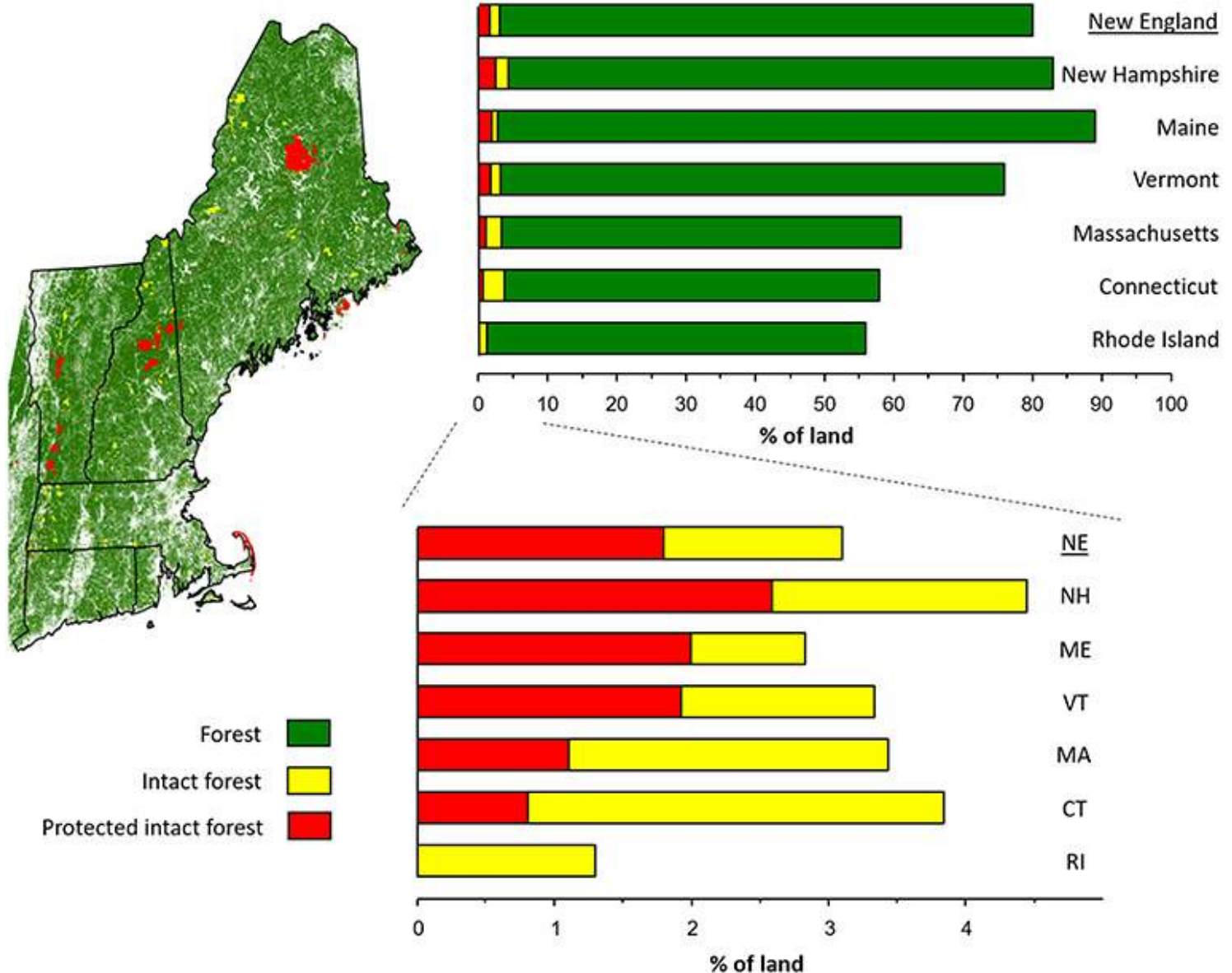
This lack of legally and fully protected forests has always been problematic regarding the protection of the public interest and the nature of Massachusetts, but the stakes are higher today due to the importance of forests for their ability to capture and store carbon.



Executive Summary (Continued)

The map below shows all New England forest areas in green and the tiny amount of remaining intact forests (areas with minimal human intervention) with permanent legal protection (in red) and without permanent legal protection (in yellow). There are almost no intact forests in all of Massachusetts with permanent legal protection from logging. For a State that likes to consider itself a leader in environmental protection, this reality tells a profoundly different story.

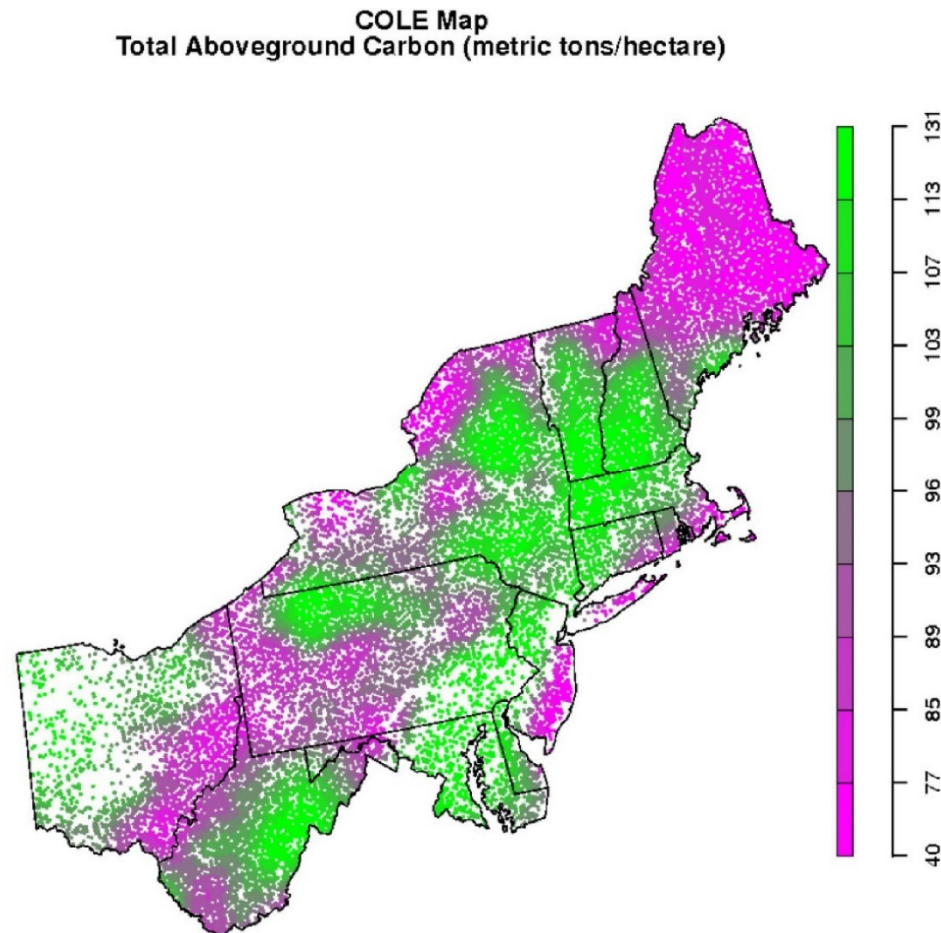
Protected New England Forests



Executive Summary (Continued)

In the Northeast, much of the historically forested areas cleared during the Colonial era have slowly returned to forest (though less extensively than in pre-Colonial times) as farming moved west. However, these gradually recovering forests are shadows of their former glory with the state of recovery dependent upon on the ongoing intensity of cutting. There are almost no old-growth forests that once covered 70-89% of the Northeast⁴ and estimates are that if existing Northeastern forests were allowed to continue to grow, they could store 2 to 4 times more carbon than they do today.⁵

The green areas on this map⁶ show still *ecologically* immature forests, that are becoming *economically* attractive, due to greater amounts of biomass (more carbon stored in bigger trees) than the more cut-over areas in purple. Consequently, increased logging and biomass burning is being aggressively planned in these areas paradoxically as these forests are developing greater ecological functioning and higher carbon storage and capture rates.



Executive Summary (Continued)

At a time in history that it is becoming clear that more forests require protection to capture and store carbon, as well as to maintain healthy ecological functioning, well-connected logging and biomass interests are working overtime to increase logging and burning of recovering forests in Massachusetts and across the Northeast.

The following is a partial list of Federal, State and Local publicly subsidized incentives and programs promoting and expanding logging and wood burning in Massachusetts alone. Almost always the titles and intentions of these programs that increase damaging forest cutting and biomass burning are disguised with nature-friendly euphemisms and specious claims about “helping” the environment.

Federal: “Young Forest” Initiative; Forest “Legacy” Program; Forest “Stewardship” Program; Cross Laminated Timber Promotion; Statewide Wood Energy Team and Wood to Energy Federal Grants; Landowner Incentive Program; Federal Biomass Subsidies, Tax Breaks, Loan Guarantees, Grants and Mandates, National Forest Logging

State and Local: Massachusetts Wood Institute; Mohawk Trail Woodlands Partnership; Chapter 61 Tax Abatement; Alternative Portfolio Standard, Renewable Portfolio Standard; “Clean” Energy Extension; Masswoods at the University of Massachusetts; State Forest, Drinking Watershed, Wildlife Management Area and Conservation Area Logging; Municipal Watershed Logging.

The following news commentary illuminates efforts to increase logging and wood burning in Massachusetts and the Northeast:

*“The [logging] controversy is occurring as logging and preservation interests increasingly collide in the Northeast’s forests, most of which were once abandoned farmland. **The trees are maturing and becoming more economically valuable** at a time when increasing numbers of people treasure the woods for walking, hiking, and recreation. How Massachusetts - the nation’s eighth-most-forested state and the third-most-densely populated - resolves that conflict could serve as an example for other Eastern states.”*⁷

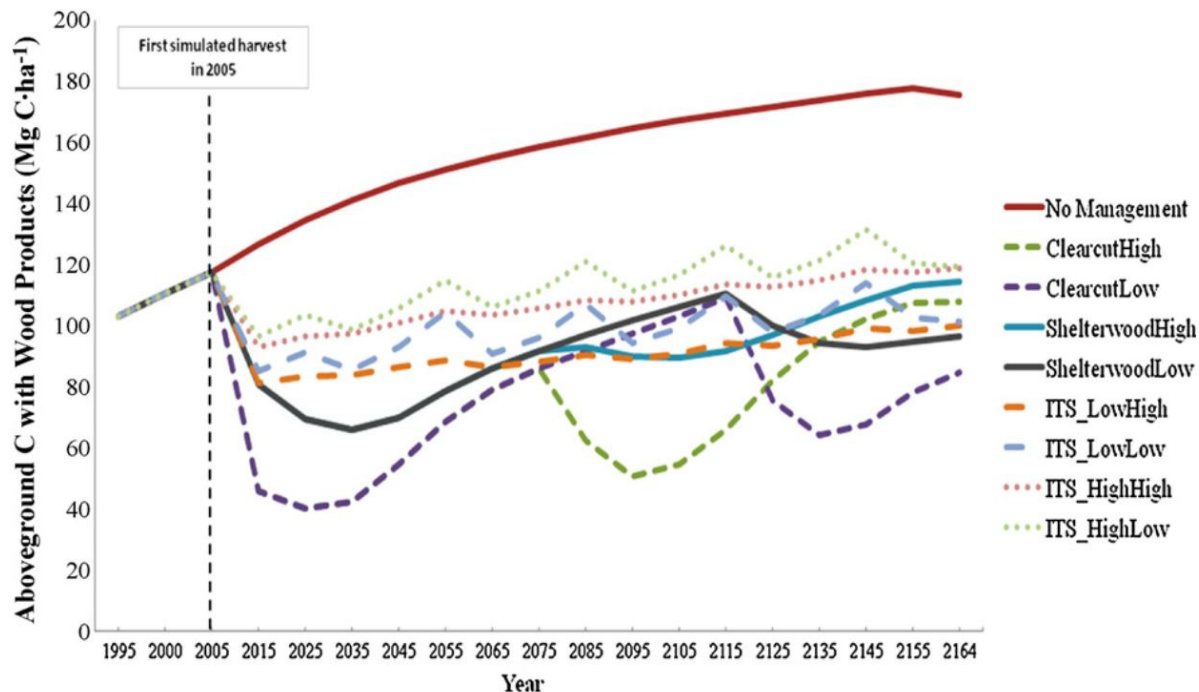
*“**State Kickstarts Western Massachusetts Wood Chip Industry**...Three Western Massachusetts forestry businesses will see the lion's share of nearly \$2.9 million in state grant funding to boost renewable heating technology and renewable fuels -- in particular, the in-state production of wood chips and the growth of efficient wood-burning furnaces and boilers. The investments are meant to jump-start the regional supply chain for wood chips and boost the forest economy while pursuing the state's clean energy goals, officials said at a celebration on Monday.”*⁸

Cutting trees and burning the wood is never “clean”⁹ or “carbon neutral”. We have known since 2009 that burning trees for energy is even worse than burning fossil fuels for carbon impacts,¹⁰ and that “no logging” is better than any logging scenario for forest carbon capture and storage. The graph on the following page from an important report at the University of Vermont shows that **carbon stored in unlogged forests (no management) is 39 to 118% higher than in logged forests**, with either selective, shelterwood or clearcut logging methods. Carbon stored in wood products is included in the analysis.

Forest Carbon Storage in the Northeast United States ¹¹

Comparison of Logging vs. No Logging (No Management)

J.S. Nunery, W.S. Keeton / Forest Ecology and Management xxx (2010) xxx-xxx



RECOMMENDATIONS: Reality should match perception. The 19% of Massachusetts forests owned by the State should be fully and legally protected. Rather than wasting public funds cutting and trucking them to Canada, or chipping them up to fuel dirty biomass energy and produce more junk mail, State public forests should be protected to capture and store carbon, clean the air and water, provide undisturbed wildlife habitat, flood control, spiritual refuge, scenic beauty, outdoor recreation, support the tourism economy, and more.

[CLICK HERE FOR A REMINDER OF THE MANY BENEFITS OF FORESTS](#)

CALL FOR AN IMMEDIATE LOGGING MORATORIUM ON ALL STATE PUBLIC LANDS

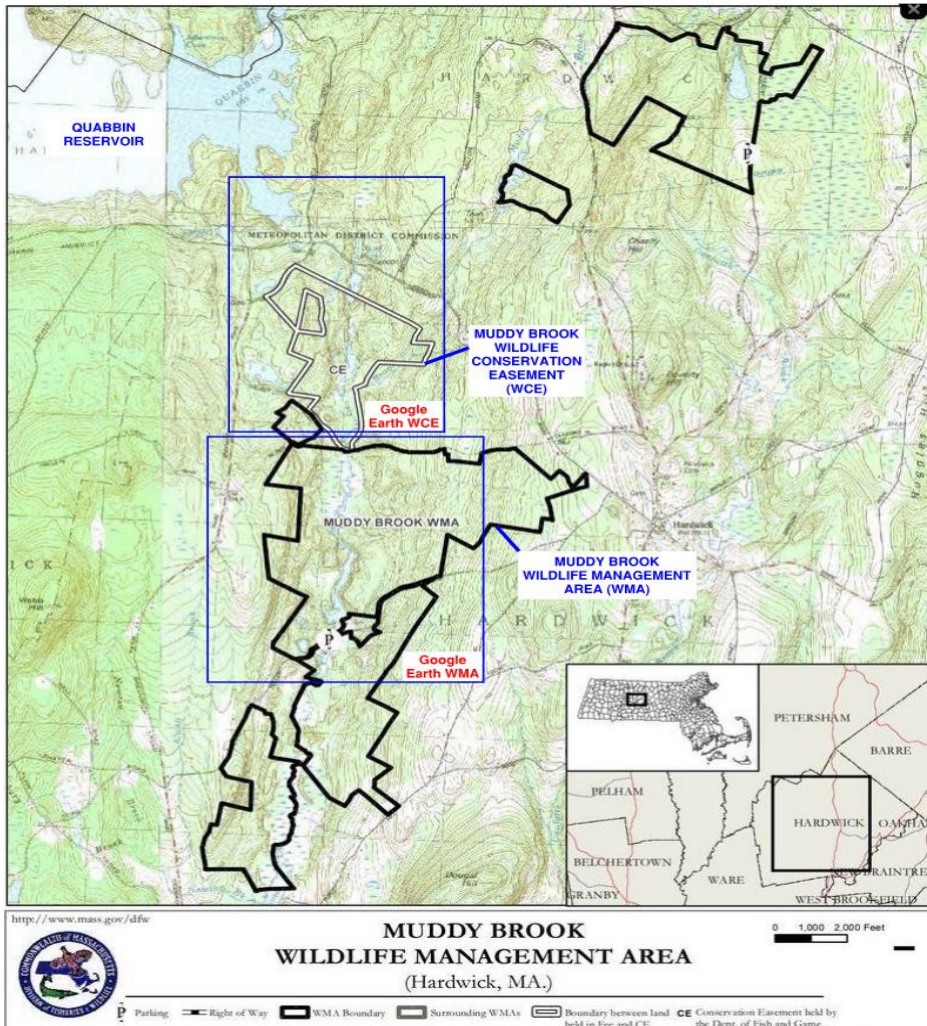
The information above and following aerial video (p. 6), photos (pp. 7-49) and discussion (pp. 32-38) of damaging (and most likely illegal) clearcutting of State forests¹² and publicly controlled conservation easements give evidence that the public interest and our public lands are not being protected by the State agencies. A moratorium is needed on State owned lands to stop the damage while a full assessment of the consequences of logging on public lands and the case for full and permanent legal protection are made.

[CLICK FOR STATE LAND LOGGING MORATORIUM PETITION](#)

CLEARCUTTING MUDDY BROOK FORESTS

All of the Destructive Clearcutting Shown in This Aerial Video and the Following Photos Occurred on Publicly Owned Land and Wildlife Conservation Easements While Under the “Care and Control” of the Massachusetts Division of Fish and Wildlife ¹³

Click For → **8 MINUTE VIDEO AND AERIAL FLIGHT**



Copy of Timber Sale Notice (1 of 4)

Contract No. CE-MB-TS2

Page 1 of 6

Commonwealth of Massachusetts, Division of Fisheries and Wildlife
Forest Products Sale Contract and Prospectus

Sale Name: **Muddy Brook Road – Patrill Hollow Tract- Muddy Brook Wildlife Management Area**

The following forest products are offered for sale by the Massachusetts Division of Fisheries & Wildlife (MassWildlife) on approximately 45 acres: 176 mbf sawtimber, 230 cords of hardwood firewood, and 2,667 tons of chipwood (chipwood is approximately 95% softwood and 5% hardwood). **Whole-tree harvesting is required** on all 45 acres to reduce fuel loads for subsequent prescribed burning. The Purchaser agrees to abide by the terms specified in this contract.

To Bid:

Prospective bidders shall supply sealed bids marked on the envelope: Bid: CE-MB-TS2

These bids shall be mailed or delivered to:
John Scanlon
Division of Fisheries and Wildlife
1 Rabbit Hill Road
Westborough, MA 01581

On or before Thursday, March 8, 2018 at 2:00 PM EST.

Showing:

Forest products will be shown by meeting MassWildlife Habitat Biologist Benjamin Mazzei at 9:00 am on Friday, February 16, 2018 on Muddy Brook Road, Hardwick, MA (see attached map).

Bid forms and contracts will be available at the showing. Prospective bidders MUST attend this scheduled showing OR make alternate arrangements with MassWildlife PRIOR TO the scheduled showing so that all bidders can be announced at the scheduled showing. If you need to make alternate arrangements, contact MassWildlife Habitat Biologist Benjamin Mazzei at 413-768-9090.

Designated trees: The trees are designated as follows:

In stands 1-2, trees marked with a red stripe shall be RETAINED, and all other trees 4" DBH or larger shall be cut.

The timber quality is **Poor to Good**. The size of the sale area is **45 acres**. Access is from **Muddy Brook Road_A** limited amount of road improvements will be necessary on Muddy Brook Road, including provision, delivery, spreading and grading of processed gravel. Purchaser must also provide a 20' skidder bridge to be retained by MassWildlife.

Species	Timber Volume Estimates of Merchantable Trees in Board Feet			Volume Estimates of Additional Wood Products		
	Stand 1 DBH Range 10-40" (Avg. 18)	Stand 2 DBH Range 10-18" (Avg. 10")	Totals	Product	Cords	Tons
White Pine	131,131	4,397	135,528	Softwood chipwood		2,320
Red Oak	8,122		8,122	Topwood chipwood		346
Black Oak	4,629	1,881	6,510	Hardwood Firewood	230	
White Oak	24,062	1,690	25,753			
Totals	167,944	7,968	175,912	Totals	230	2,667

Volume estimates provided for comparison purposes only. Estimates are based on a limited number of prism plots in each stand. Softwood chipwood volume includes boles and topwood of non-timber softwood trees. Topwood chipwood volume includes tops of both softwood and hardwood timber trees. Purchaser is responsible for inspecting and determining wood products volume to their own satisfaction prior to bidding on this contract.

Muddy Brook: Current Clearcut Acres: WMA: ~332 WCE: ~175 Future Planned Clearcut Acres: WMA: ~318 WCE: ~305 ¹⁴

**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Google Earth WMA Area Images (~350 acres)**

“Before - 2014” (N42.346774, W72.230916)



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA (WMA)**

MGL Chapter 131: Section 4: Part 16: “It Shall Be a Condition of Each Contract for the Cutting and Sale of Timber That Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”¹⁵

“After - 2019”



Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Drone Photo, April 2020



“Busy monster eats holes in the spirit world” ~Bruce Cockburn

Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Ground Photos, March 2020 *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



Every creature is better alive than dead, men and moose and pine trees. ~Henry David Thoreau



Massachusetts State Division of Fish and Wildlife Public Forests

M.G.L.c. 132A, Section 2B: “Nature of use of acquired lands. It is hereby declared to be the policy of the Commonwealth that all such sites acquired or developed by the commissioner shall in so far as practicable be preserved in their natural state; and they shall be in so far as possible collectively self-supporting; and that no commercial activities except those essential to the quiet enjoyment of the facilities by the people shall be permitted”



Massachusetts State Division of Fish and Wildlife Public Forests

CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA

Ground Photos, March 2020 *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



“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.”

**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA**

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 grown trees well distributed over the area"



This Was a Vernal Pool, April 2020

**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA**

Ground Photos, March 2020 *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA**

MGL Ch 131 Sect 4-16: *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA**

Ground Photos, March 2020 “Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”



We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect. ~Aldo Leopold

**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Ground Photos, April 2020**



Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING MUDDY BROOK WILDLIFE MANAGEMENT AREA
Ground Photos, April 2020 *“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”*



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST (~175 acres)
Conservation Easement Purchased by the Division of Fish and Wildlife for \$500,000 ¹⁶
Before and After - Google Earth Images**

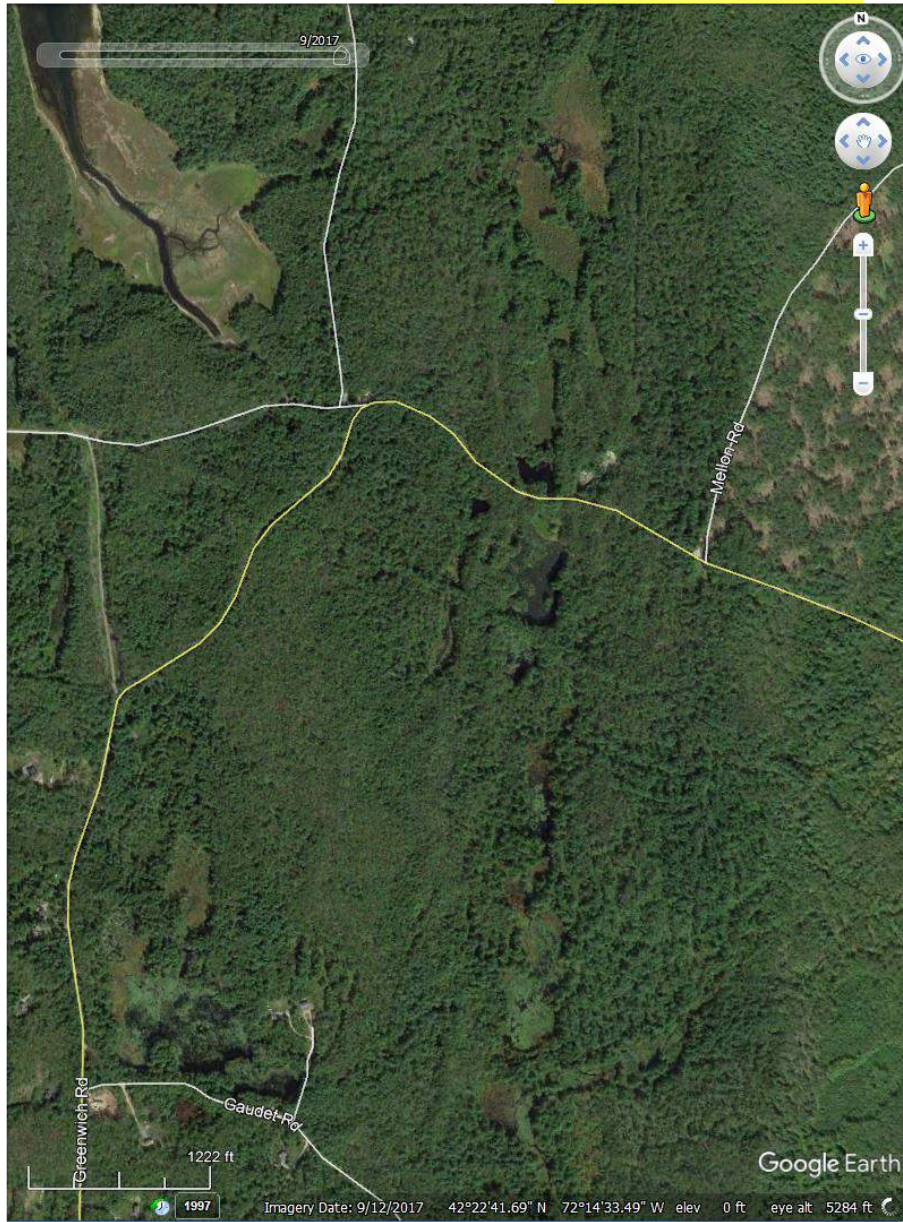


Image Date 2017

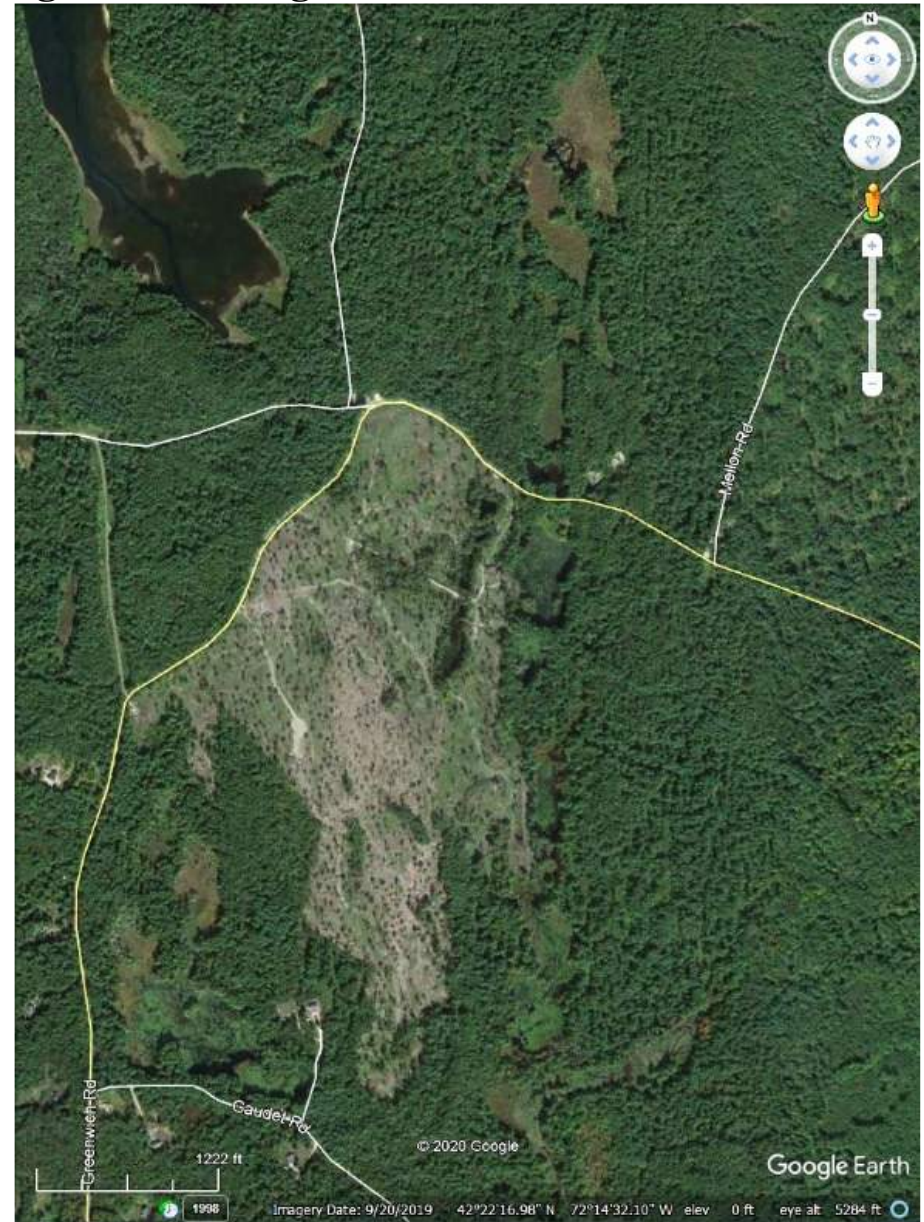


Image Date 2019

**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Google Earth “WCE” Area Images (N42.369176, W72.234567) “Before – 2017”**



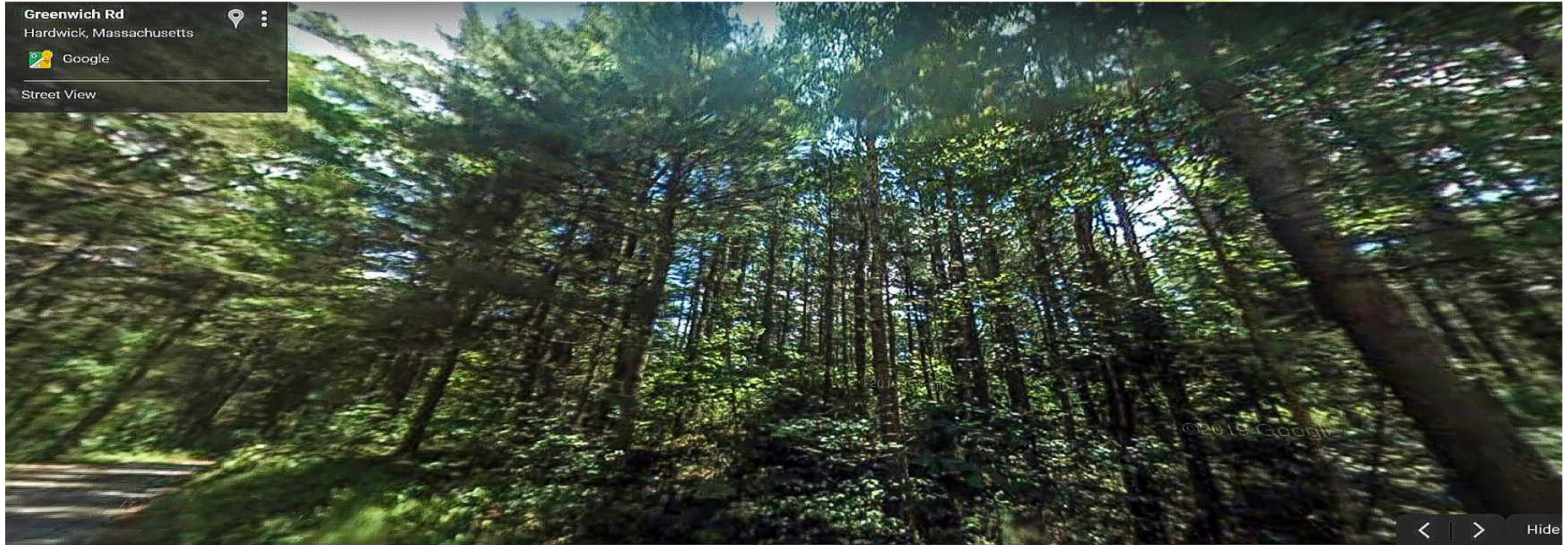
**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Google Earth WCE Area Images “After - 2019”**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Drone View of Clearcutting With the Quabbin, Boston’s Drinking Water in The Back**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Greenwich Road, Hardwick - Google Street View “Before”**



Ground Photo March 2020 “After”



MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST Ground Photos, March 2020



When the soil disappears, the soul disappears. ~Ymber Delecto



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Ground Photos, March 2020**



We do not inherit the earth from our ancestors, we borrow it from our children. ~Native American Proverb



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Ground Photo, March 2020**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Ground Photo, April 2020**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Ground Photo, March 2020**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST
Ground Photo, April 2020**



**MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land
CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST**
Ground Photos, April 2020



MA Division of Fish and Wildlife “Care and Control” of WCE Forest on NEFF Land CLEARCUTTING MUDDY BROOK WILDLIFE “CONSERVATION” FOREST

Ground Photos, April 2020



CLEARCUTTING MUDDY BROOK WILDLIFE AND CONSERVATION FORESTS

Discussion

At Muddy Brook, the Massachusetts Division of Fish and Wildlife plans to clearcut (in all but name) most of ~1100 acres of beautiful, native White Pine and Oak forest that was peacefully capturing and storing carbon, cleaning the air and water, supporting wildlife and biodiversity, as well as providing flood control, scenic beauty, and recreational opportunities before DFW decided to "improve" things with their chainsaw medicine.¹⁷ (~ 50% is already cut) The stated goal of such forest destruction is to restore a "barrens" that *appears* to have been there. However, even if it was ever there, it was temporary and only due to logging and fire by humans:

*“Aerial photography from 1938 shows the core area of Patrill Hollow to be nearly free of trees and covered by what **appears to be a combination of heathland and scrub oak shrubland communities**, the exact desired conditions described in this plan for this core area. Those historic conditions were no doubt brought about by a combination of timber harvest and fire”*¹⁸

DFW claims that clearcutting existing forests and perpetually burning the land to impede natural forest growth will mimic a millennia of Native American fire that created open lands. Not only is clearcutting native forests to mimic human-set fire patterns an illogical management plan for naturally forested lands, but there is also strong evidence that these lands were continuously forested right up until the deforestation that occurred during European colonization:

*“Climate largely controlled fire severity in New England during the postglacial interval, and **widespread openlands developed only after deforestation for European agriculture.**”*¹⁹

Even the pollen samples which DFW considers definitive for determining the site history were inconclusive at the time the Muddy Brook plan was released in 2018. Clearcutting began in 2014.

The scale of the devastation is appalling. Supposedly there are small pockets of barrens vegetation, but a tour of more than half the total area turned up only a few isolated individuals and one small area with a handful of pitch pines. Even if such pockets exist, there is no excuse for such extensive damage to this native forest that has been naturally recovering for at least 130 years.

This massive, destructive cutting and burning operation will release ~153,000 tons of CO₂ and require periodic burning and herbicides in perpetuity to maintain the landscape.²⁰ Such clearcutting and intentional burning causes extensive ecological damage, but it does serve the special interests who stand to benefit: bigger budgets for the DFW bureaucracy, the best wood for timber companies set loose with industrial scale clearcutting, wood chips for a hungry biomass industry and wide open shooting galleries for hunters.

When a man says to me, "I have the intensest love of nature" at once I know that he has none. ~Ralph Waldo Emerson

CLEARCUTTING MUDDY BROOK WILDLIFE AND CONSERVATION FORESTS

DFW chooses to put lipstick on the Muddy Brook pig rather than acknowledge the extensive ecological destruction that has occurred “restoring” a mythological landscape that likely never existed. To DFW - clearcut native forests, a denuded landscape, dead forest critters, large carbon emissions and destroyed forest ecosystem functioning are just unmentioned footnotes in an “exciting” project:

“MassWildlife considers the on-going work within the Patrill Hollow section of the Muddy Brook WMA to be one of the most important and exciting restoration opportunities in the Commonwealth.” Chris Buelow and John Scanlon March 25th, 2020 ²¹

Disturbingly, DFW is repeating such destruction of native forests across the state, with routine clearcutting of public forests to make more barrens targeted for many thousands of acres of State forests in central Massachusetts alone.²²

Why is the Massachusetts Division of Fish and Wildlife *increasing* carbon emissions and destroying native forests at the very moment the rest of the world is waking up to the need to reduce carbon emissions and protect forests?

Muddy Brook clearcutting of these native forests ignores the following damage which harms so many ecological processes and networks of life that occur in an undisturbed living forest:

- Emit More than a 150,000 Tons of CO₂
- Ongoing Loss of Carbon Capture and Storage Each Year
- Destroyed Homes and Nests of Existing Wildlife and other Forest Species
- Soil Compaction, Soil Erosion, Soil Carbon and Mineral Loss, Forest Fragmentation
- Reduced Air and Water Filtration Capacity, Reduced Flood Control, Disturbed Wetlands
- Increased Stream Sedimentation and the Silting of Stream Bottoms, “Muddier Brook WMA”
- Risk to Water Quality and the Impairment of Life Cycles and Spawning Processes of Aquatic Life
- Biodiversity Loss: Alleged Benefits for a Few Target Species but at the Expense of a Greater Number of Forest Species
- Harmful Forest Edge Effects Including Blowdown
- Expansion of Invasive Species and Use of Chemical Herbicides Including Roundup
- Scenic Devastation, Lost Recreation Opportunities, Depressed Citizens, Fire and Smoke Hazards
- Misspent Public Funds, Loss of Respect for Massachusetts State Institutions
- Not Respecting Massachusetts General Laws ²³

*MGL Chapter 131: Section 4: Part 16, Division of Fish and Wildlife: “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**”*

- Not Respecting Original Conservation Easement Restrictions and Requirements ²⁴

Prohibited: “Activities Detrimental to Drainage, Flood Control, Water Conservation, Erosion Control, or Soil Conservation”
Required: Retain 10-60% Portion of Overstory Trees at All Times; Retain 30-50% Woody Debris” (Ground Slope Dependent)

Forests Clean the Air We Breathe and the Water We Drink, Respect and Protect Them



MASSACHUSETTS DIVISION OF FISH AND WILDLIFE

General Discussion

Aggressive New Logging Plans:

Alarming, the forest destruction at Muddy Brook is just one example of the aggressive logging planned by DFW who have plans to systematically clearcut (in all but name) 86% of Wildlife Management Area and Wildlife Conservation Easement forests on a rotational basis to create 12.5% “early successional habitat” across the DFW landscape.²⁵ But clearcutting DFW forests is explicitly illegal.²⁶

*MGL Chapter 131: Section 4: Part 16, Division of Fish and Wildlife: “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**”*

DFW attempts to skirt the law by claiming that is actually “seed tree” logging we see denuding the landscape, but many areas are left without enough trees to meet that definition and other areas are stripped bare without a single tree standing. Such industrial logging has no legitimate place on public lands and the current law demonstrates that some forward-looking politician was aware of ongoing special interest pressures and knew it would one day be necessary.

Does DFW logically plan to limit their clearcutting to an area equal to the 12.5% habitat goal in the early successional stage? No.²⁷ In a manner identical to commercial logging, they plan to clearcut new forest areas each year in a perpetual timber cutting rotation that would eventually cut 86% of all DFW forests to create “young forests”.²⁸ That sounds bright and happy but Massachusetts already has plenty of young forests. What is needed are mature forests where time can heal disturbances and allow ecological interactions to develop.

Since a recovering clearcut forest spends about 10 years in a functional early successional stage,²⁹ to maintain so much “young forest” by clearcutting new forest areas rather than maintaining existing ones, DFW would need to clearcut ~2,800 acres of our best State forests *each year*. (about 2,100 football fields)^{30,31} This comes in addition to all the clearcutting of DCR woodlands and Quabbin drinking watershed public forests. Based on Massachusetts law, DFW should be clearcutting exactly zero acres per year.

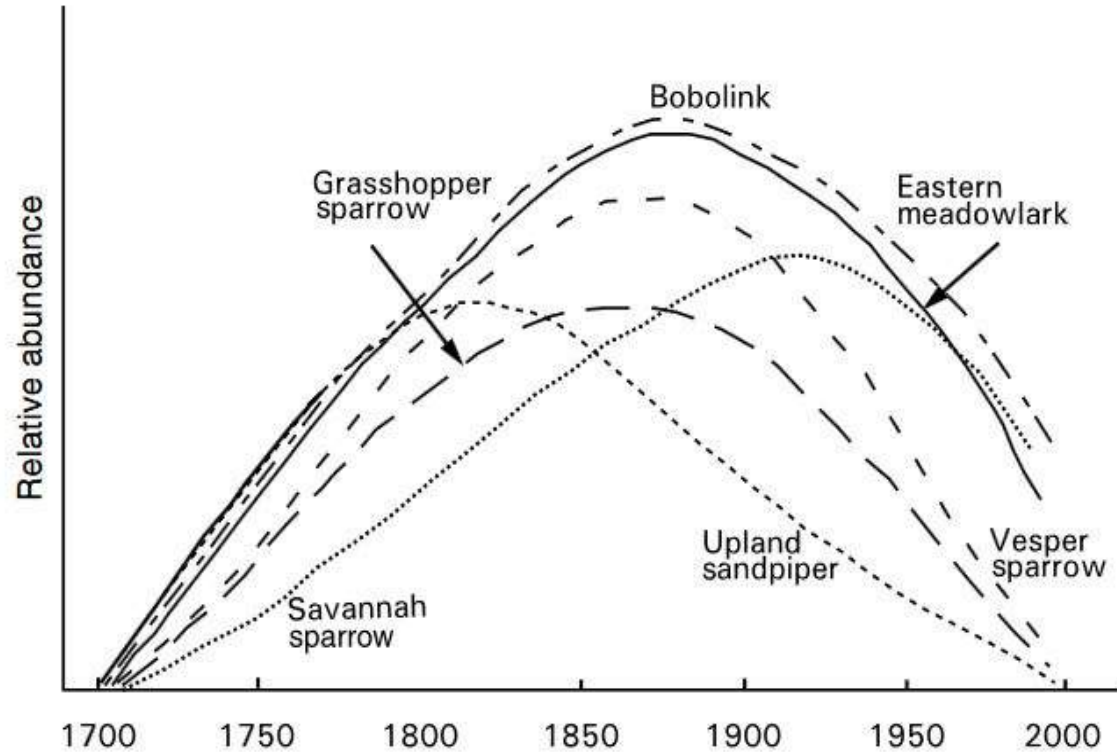
Creating “young forests” and “early successional habitat” for wildlife is the boilerplate and manipulative excuse DFW uses to confuse a well-intentioned public who object to clearcutting their public forests. DFW neglects to mention that this type habitat already exists at greater than natural levels,³² that many of the species that allegedly benefit are hunted or are in decline due to other human impacts,³³ and that more species are harmed by logging, especially those which depend on undisturbed interior forest. DFW themselves note that Muddy Brook logging has the potential to kill species protected under the Massachusetts Endangered Species Act.³⁴

Critically, DFW ignores that so-called declining “early successional species” are generally just returning to natural levels as forest cover has returned to the landscape over the past century. The graph on the next page of grassland bird species shows the typical rise and fall of early successional species that rose in the eighteenth and nineteenth centuries with deforestation for agriculture and which then reduced over the past century as farms moved west and forest area gradually recovered.³⁵

MASSACHUSETTS DIVISION OF FISH AND WILDLIFE

General Discussion

Typical Rise and Fall of Early Successional Species



With the commercial cutting rotation proposed by DFW, the maximum forest age for these forests would be only ~61 years old.³⁶ These are forests where trees can live for 300 years (or more) which would be cut down just as they are starting to develop into functioning forest ecosystems and as they are capturing and storing more carbon at higher and accelerating rates.

Magnificent old-growth forests represent practically 0% of the Massachusetts landscape³⁷ yet DFW plans to leave only about 12% of their forests (0.05% of the MA landscape) in peace to mature and clearcut the rest.³⁸ This is a tragic lost opportunity to restore some old-growth forests which once covered 70-89% of the MA landscape³⁹ especially on our public lands provide the best opportunity for some restoration of these beautiful and critically important forests.

If our State public land managers prefer wide open savannahs with unconcealed game over the naturally forested environment of New England, perhaps they should transfer to Montana...or Africa?

To Learn About the Importance of An Intact Forest Canopy [CLICK HERE](#)

MASSACHUSETTS DIVISION OF FISH AND WILDLIFE

General Discussion

Misleading Carbon Claims:

To quiet a skeptical public raising questions about the clearcuts they increasingly encounter on their public lands and to gloss over carbon concerns, DFW produces a slick publication to sell logging to the public and which cheerfully makes the misleading claim that DFW logging has emitted 130,000 carbon tons since 1966.⁴⁰ Taking into consideration the more than 200 timber sales since 1966, that Muddy Brook logging alone would release ~41,000 carbon tons, and that DFW proposed future aggressive logging would drastically increase emissions to ~103,000 carbon tons *per year* (~380,000 tons of CO₂), this statement is not credible.^{41 42}

Another gimmick claim is that “*there is very little carbon released compared to overall storage*” from logging.⁴³ In fact, a forest *without* logging stores much more carbon (39-118%) than a logged forest.⁴⁴ Proposed aggressive DFW logging would drastically increase DFW carbon emission rates and reduce carbon sequestration rates. The more logging, the less carbon that will be captured and stored in the forest, the exact opposite of what we need today. Nature and humanity are in a big hole, it is time to stop digging.

Selling Logging to the Public:

“It’s hard to sell New England Forestry Foundation memberships on the notion that we harvest trees. We have to frame it that we protect land - we have to go at it obliquely.”

Whitney Beals, New England Forestry Foundation⁴⁵

If the goal is to pad budgets and satisfy timber, biomass and hunting interests a pretext will be found... or manufactured.

We are told to believe that we “need” to log and clearcut our public forests to “help” wildlife, “increase” biodiversity” and “improve” nature reeling under human assault on all sides. A school child would dispute this claim, but thoughtful adults might recognize the prescription as the same self-serving human hubris which causes the disease. Doing the same thing over and over and expecting a different result is one definition of madness.

A long list of specious justifications promoted by the timber industry, hunting interests, industry-affiliated academics and pro-intensive management State agency staff is used to sell the public on the idea that logging “helps” nature, but rarely are such claims submitted to the scrutiny of rigorous science. In wildlife planning, where so much clearcutting is promoted, only 6% undergoes an external independent review.⁴⁶

When peer reviewed science based on comprehensive long-term research, and when independent experts without any vested interest in logging are consulted, the claimed ecological motivations for logging forests are all too often found lacking and to be based on cherry-picked data, exaggerated or dubious benefits, spurious assumptions and conclusions, and/or neglect to mention significant negative impacts.⁴⁷

MASSACHUSETTS DIVISION OF FISH AND WILDLIFE

General Discussion

Selling Logging to the Public (Continued):

"What is the recipe for getting people to accept unsightly practices like clear-cutting? Give them plausible sounding reasons: tell them that the forest is unhealthy, that red maple is taking over, that alien species are invading, that trees will fall on people, that there is an unacceptably high fire danger, that a hurricane will blow everything down. Sound familiar? Presumably, clear-cutting is needed to help avert such impending catastrophes. But if people aren't buying, what then? Push the "early successional habitat" argument. Win support from a naive public by insisting that we need more cottontails and game bird species, suggestive of a mid-1800s landscape. Have I missed any of the arguments?" "By the way, I've been told in private, by foresters, that these are the standard talking points that state and federal forest agencies routinely use to soften up the public prior to an unpopular action."

~Robert Leverett, Forest Ecologist & Executive Director Eastern Native Tree Society

Peer review comments from the MA FSC Forest Report explaining how to sell logging to a skeptical public are illuminating:⁴⁸

"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."

"DFW are the wildlife people, "helping wildlife with habitat management." The review team noted DFW is prohibited by State statute from clearcutting, 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."

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

"A continued and increasing supply of forest products is the last item in the list of public interests to be protected by DCR. I think a good image for DCR would be "keepers of the forest," and "growing trees for the future." I am quite sure that "DCR—the timber people—cutting trees for bigger budgets" would be a publicly unacceptable and politically unsupportable image."

"DCR: Good forestry means lower water rates. That slogan will sell in Boston."

Massachusetts State Division of Fish and Wildlife Public Forests

CLEARCUTTING HERMAN COVEY WILDLIFE MANAGEMENT AREA

More Destructive Clearcutting of Native White Pine and Oak Forests for more Barrens and Burning, March 2020



**Our Best State Forests, Stacked and Ready for Trucking to Quebec, to “Help” wildlife
Herman Covey WMA, March 2020**

Massachusetts State Division of Fish and Wildlife Public Forests

CLEARCUTTING HERMAN COVEY WILDLIFE MANAGEMENT AREA

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Massachusetts State Division of Fish and Wildlife Public Forests
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Massachusetts State Division of Fish and Wildlife Public Forests

CLEARCUTTING HERMAN COVEY WILDLIFE MANAGEMENT AREA

More Destructive Clearcutting of Native White Pine and Oak Forests for more Barrens and Burning, March 2020



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA**

Destructive Clearcutting of Native Public Forests

Google Earth View "After 2019"



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA**

“Clearcutting Timber on Lands Managed by the Division is Specifically Prohibited”

Google Earth View “After 2019”



Massachusetts State Division of Fish and Wildlife Public Forests CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA

Enjoy Your Public Lands, - May 2020



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA**

In 2017 this was a Maturing Native White Pine Forest, With Large Trees Sheltering Wildlife, Cleaning the Air and Water, and Quietly Capturing and Storing Carbon



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA
Ground Photos, May 2020**



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA
Ground Photos, May 2020**



**Massachusetts State Division of Fish and Wildlife Public Forests
CLEARCUTTING BIRCH HILL WILDLIFE MANAGEMENT AREA
Ground Photo, May 2020**



LOGGING AND CLEARCUTTING MASSACHUSETTS STATE PUBLIC FORESTS

Summary

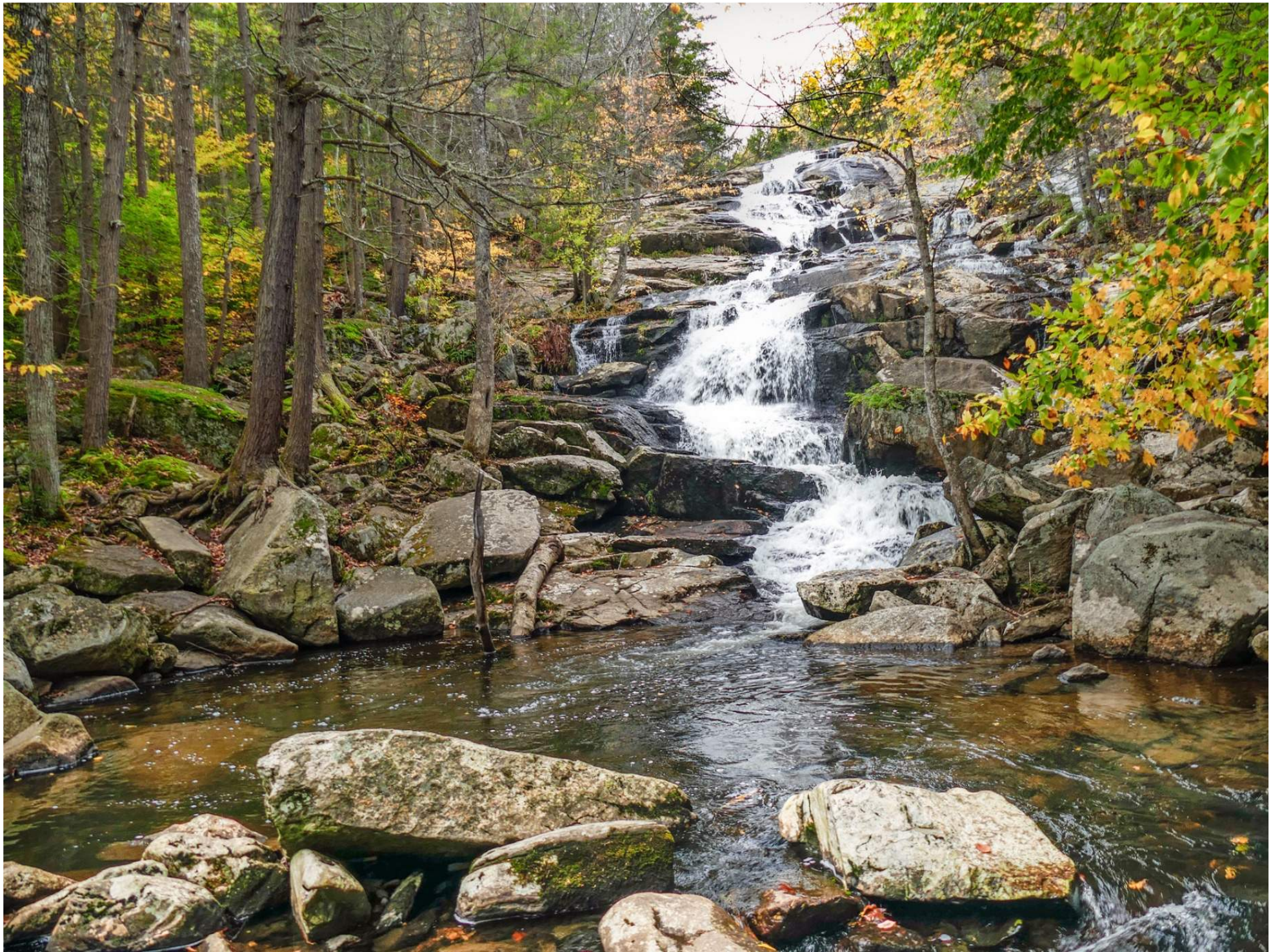
It is not news to many that public land managers often disguise (even to themselves) financial and other special interest goals with dubious and illusory ecological benefits while ignoring real and significant negative impacts, but the stakes are too high now to continue doing so. The time has arrived to stop such counterproductive exploitation of our critical public forests at the expense of us all and the environment we depend upon for life.

No longer should planning decisions for our public forests be done without genuine priority given to acting in the best interest of the public and the environment. We must restore accountability to our “captured” State lands agencies who too often act as though our public forests are resources for private interests, and who diligently spin reality on its head on their behalf to confuse the public with absurd notions that clearcutting our best forests and trucking the wood to Canada is done to “help” nature. Such a lack of basic sense is always offensive, but at this moment of a climate crisis and a natural world under relentless attack, it is pure madness.

In summary, Massachusetts needs to urgently strengthen and enforce its laws to end the unaccountable “wild-west” logging of our public forests masquerading as concern for nature. Logging in general of State-owned public forests and easements should stop now. Exceptions should only be allowed for extremely rare and specific cases when a preponderance of peer-reviewed scientific evidence demonstrates beyond all doubt that human intervention would clearly, and genuinely, benefit the public and environmental protection.



[**CLICK FOR STATE LAND LOGGING MORATORIUM PETITION**](#)



Citations and Calculations

- 1 <http://www.maforests.org/Report.pdf> Page 19
<http://www.maforests.org/NorthamptonMoney.pdf>
- 2 DCR Parks, Reserves and Woodlands: 314,000 acres <https://www.mass.gov/service-details/forestry-on-state-public-lands>
DCR Watershed Forests 102,000 acres, WPR: 8,000 acres <https://mass-eoea.maps.arcgis.com/apps/Cascade/index.html?appid=a58edce07dec4308b68cbaa03112ff02>
DFW Forests WMA 167,000 acres, WCE and Sanctuary: 50,000 acres <http://www.maforests.org/LandAcquisition18.pdf>
Total Publicly Owned State Forests DCR Parks, Reserves and Woodlands + DCR Watershed + WMA: 314,000 + 102,000 + 167,000 = 583,000 acres
Total Massachusetts Forests, 3,025,000 acres https://www.fs.fed.us/nrs/pubs/ru/ru_fs89.pdf
Total Massachusetts Land Area, 20,202 km² * 247.105 = 4,992,000 acres <https://www.worldatlas.com/aatlas/infopage/usabysiz.htm>
Total DCR Forests Protected from Logging = 76,904 + 111,227 = 188,131 acres <http://www.maforests.org/DCR%20Landscapes.pdf> Page 6
Possible WMA Forests Protected from Logging = ~12.5% * 167,000 ~ 21,000 acres <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> Slide 6
Total State Public Forests Protected from Logging = 188,131 + 21,000 = 209,131 acres
State Public Forests as percentage of All Forests = 583,000 / 3,025,000 * 100% = 19%
State Public Forests as percentage of All Land = 583,000 / 4,992,000 * 100% = 12%
Protected State Public Forests as percentage of State Forests = 209,131 / 583,000 * 100% = 36%
Protected State Public Forests as percentage of All Forests = 209,131 / 3,025,000 * 100% = 7%
Protected State Public Forests as percentage of All State Land = 209,131 / 4,992,000 * 100% = 4%
- 3 <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>
- 4 www.maforests.org/Lorimer%20and%20White%20-%20ES%20Habitat.pdf page 14 of 24
- 5 https://www.uvm.edu/rsent/wkeeton/pubpdfs/Keeton%20et%20al.%202011_Forest%20Science.pdf Page 502
- 6 From US Forest Service 2010 www.ncasi2.org/COLE/
- 7 http://archive.boston.com/lifestyle/green/articles/2010/03/04/a_clear_cut_controversy
- 8 https://www.masslive.com/news/2019/02/baker_admin_supports_western_m.html
- 9 http://www.maforests.org/doer_pellet_guidebook.pdf Page 14
- 10 <http://www.maforests.org/90scientistsletter.pdf>
<http://www.maforests.org/Carbon.pdf>
<http://www.maforests.org/SCIENCE.pdf>
<http://www.maforests.org/European%20Environment%20Agency.pdf>
<http://www.maforests.org/BiogenicGeologic%20August%202011.pdf>
<http://www.maforests.org/Biomass%20Assumptions.pdf>
<http://www.maforests.org/Biomass%20energy%20-%20not%20sustainable%20or%20carbon%20neutral.pdf>
- 11 <http://www.maforests.org/Keeton.pdf> Volume 259 pages 7, 12
- 12 <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIX/Chapter131/Section4> Part 16
- 13 <http://www.maforests.org/DFW%20Carbon%20BS.pdf> Page 11
- 14 <http://www.maforests.org/Patrill%20Hollow%20Habitat%20Management%20Plan.pdf> Page 4 & WCE Cutting Plan, WMA/WCE: Cut 332/175 Planned 318/(480-175) = 305
- 15 <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIX/Chapter131/Section4> Part 16
- 16 <http://www.maforests.org/MIXTER%20CONSERVATION%20EASEMENT.pdf> Pages 16, 41 of 47
- 17 <http://www.maforests.org/Patrill%20Hollow%20Habitat%20Management%20Plan.pdf> Pages 4 350 + 300 + 480 = 1130 acres
- 18 <http://www.maforests.org/Patrill%20Hollow%20Habitat%20Management%20Plan.pdf> page 9
- 19 https://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/Oswald_NatureSust_2020.pdf
- 20 See <http://www.maforests.org/MBCarbon.pdf> Page 1
- 21 Per Email Thread Correspondence, March 25, 2020
- 22 <http://www.maforests.org/Patrill%20Hollow%20Habitat%20Management%20Plan.pdf> page 6
<http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 24
- 23 <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIX/Chapter131/Section4> Part 16
- 24 <http://www.maforests.org/MIXTER%20CONSERVATION%20EASEMENT.pdf> Pages 5,24,30,47 of 47
- 25 <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 6

Citations and Calculations (Continued)

- 26 <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXIX/Chapter131/Section4> Part 16
- 27 Per DFW Management on Tully WMA Tour, October 3, 2019
- 28 <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 6
<http://www.maforests.org/LandAcquisition18.pdf>
Division of Fish and Wildlife WMA and WCE total acreage ~ 221,000 acres
Grassland and Shrubland ~10%, ~ 22,000 acres
Forest Left to Mature in Peace ~ 12.5% , ~ 28,000 acres
Total Forest in Timber Rotation ~ 77.5% , ~171,000 acres
 $\% \text{ of DFW controlled Forest on a logging rotation} = 171,000 / (171,000+28,000) * 100 = 86\%$
- 29 <http://www.maforests.org/Managing-Forests-for-Trees-and-Birds-MA.pdf> page 22 (13 of 15) Table 4
- 30 <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 6
- 31 <http://www.maforests.org/LandAcquisition18.pdf>
Division of Fish and Wildlife WMA and WCE total acreage ~ 221,000 acres
Grassland and Shrubland ~ 10%, ~ 22,000 acres
Forest Left to Mature in Peace ~ 12.5%, ~ 28,000 acres
Total Forest in Timber Rotation ~ 77.5%, ~ 171,000 acres
Early Successional Habitat Stage (221,000 * 12.5 %) = 28,000 acres Other Ages = 143,000 acres
Acres Clearcut Per Year to Maintain 12.5% ESH = 28,000 acres / 10 years = 2,800 acres clearcut per year / 1.32 = 2,121 football fields including the end zones
- 32 www.maforests.org/Lorimer%20and%20White%20-%20ES%20Habitat.pdf page 58 and 59
- 33 <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 42
- 34 <http://www.maforests.org/MBESA.pdf>
- 35 <https://pdfs.semanticscholar.org/56d4/afbb6a1b80b25fae122ba80885d6fe240448.pdf>
- 36 $\% \text{ of DFW controlled Forest on a clearcut logging rotation} = 171,000 / (171,000+28,000) * 100 = 86\%$
 $\% \text{ timber rotation forest cut each year} = 2,800 / 171,000 * 100 = 1.64\%$ Maximum forest age = $100\% / 1.64\% = 61 \text{ years}$
- 37 <https://www.massaudubon.org/our-conservation-work/advocacy/priority-legislation/old-growth-forests>
1,500 acres old growth / 4,992,000 total land * 100% = 0.03%
- 38 <http://www.maforests.org/DFW%20Landscape%20Goals.pdf> slide 6
- 39 www.maforests.org/Lorimer%20and%20White%20-%20ES%20Habitat.pdf page 14 of 24
- 40 <http://www.maforests.org/DFW%20Carbon%20BS.pdf> Page 13 0.13 million tons = 130,000 tons
- 41 See <http://www.maforests.org/MBCarbon.pdf> Page 1
- 42 See <http://www.maforests.org/MBCarbon.pdf> Page 2
- 43 <http://www.maforests.org/DFW%20Carbon%20BS.pdf> Page 10
- 44 <http://www.maforests.org/Keeton.pdf> Volume 259 pages 7, 1
- 45 www.maforests.org/FF%20Notes%20May%202010%20-%20NEFF.doc Page 9
- 46 www.maforests.org/ScienceMissing.pdf page 2
- 47 https://www.maforests.org/Timberspeak-Timber_Industry_Propaganda.pdf page 18
- 48 <http://www.maforests.org/forestgreencertreport.pdf> Pages 150-152 Note: DEM an MDC were renamed and moved under DCR after this Report

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