

Green Futures

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"Citizen action for better communities."

Peter Church, Director of Forest Stewardship
Bureau of Forestry
MA Dept. of Conservation and Recreation
51 Causeway St., Suite 600
Boston, MA 02114

April 5, 2013

Dear Director Church,

After reading the Bureau of Forestry's "Responses to Comments – Freetown Co-peace Forest Management Proposal" we are disappointed at the degree to which the Bureau of Forestry (BOF) dismissed the concerns we and others raised.

Specifically, the following three primary items of concern should have been fully addressed ...but weren't! Below are the three simple actions we feel strongly about and that the BOF should undertake.

1- That the egregious erosion of the hillside above Rattlesnake Brook, caused by illegal OHV activity, is repaired before any logging is allowed and that the illegal OHV activity is halted now and a plan is put in place to prevent it in the future.

2- That when the BOF's regional forester proposes an area of the Southeastern Massachusetts Bioreserve (SMB) for "timber harvest" he does so after consultation with the SMB partners and stakeholders. They are the folks with the "boots on the ground" that know the SMB intimately and best.

3- That the BOF's regional forester in consultation with the other SMB Partners develop a long-range forest management plan for the SMB. If, like the BOF, every SMB partner randomly decided to log the property they manage, biodiversity would come out the loser. Biodiversity is the "product" ... "timber harvest" the by-product.

We realize funding is an issue in these difficult economic times, but two of the three actions, listed above, do not require much more than a few meetings with the SMB partners and stakeholders.

Funding for the erosion and brook remediation should come from the OHV penalty fund and from major funding DCR receives from the Federal Trails Program that is distributed by the US Department of

Transportation. DCR must also have grant writers that could identify other funding sources ...maybe from major OHV manufacturers ...they are always looking for good PR ...that could be used for this project. Out-reach to other state agencies and private non-profit organizations for assistance should also be pursued.

The Sea-Run Brook Trout Coalition has Rattlesnake Brook listed as a "salter" stream. Involve them!

In short, we see scant mention, and no details, of a damage remediation plan that actually commits material and action ...along with a detailed, robust follow-up plan with severe penalties to keep illegal ATVs and dirt bikes out of fragile areas where they are not supposed to be.

BOF's responses to comments, such as, "*Joint "sting" operations with the issuance of citations and fines "will be considered"*" lack commitment. "*Will be considered*" and "*if necessary*" are just equivocal "weasel words" used to avoid direct commitment.

Other responses to comments defend the BOF's "timber harvest" interests ...which we do not oppose when conducted for specific biodiversity purposes ...or simply lapse into the usual knee-jerk forestry jargon we've all heard before.

Here's one example of a "timber harvest" proposal we believe would be beneficial to the SMB. Timber becomes the by-product. The product is maintaining native species diversity. We would love to see the BOF adopt this approach in SMB forest management.

The Hartford or climbing fern (*Lygodium palmatum*) is listed by NHESP as a "Species of Special Concern." NHESP states there are only a few dozen colonies of this fern in Massachusetts. Hartford fern populations are rare and localized. To thrive, the Hartford fern requires a moist, very acidic, sandy soil with a sparse pine-oak forest and an understory that allows plenty of sunlight to reach the forest floor.

Within the Freetown State Forest is the only Hartford fern colony in the SMB. This colony is dying out as the adjacent forest trees mature and the canopy increases. A proposal, from the BOF, after consultation with a pteridologist, to conduct a timber harvest in the Hartford fern area would allow for timber extraction and create the ecological conditions necessary for the continued existence of the SMB's Hartford fern colony. Active management should be employed to save this unique species and creative "timber harvesting" could be a part of that.

Lastly, BOF's belief that the forest within the Bioreserve "generally consists of even-aged trees" is not entirely correct. Large areas of the Bioreserve, within the Freetown State Forest at Breakneck Hill, off Slab Bridge Road, areas off Cedar Swamp Road and Copicut Road were clear-cut for bio-mass and fuelwood after the death of thousands of oaks due to three years of defoliating gypsy moths, winter moths and forest tent caterpillar. Weakened survivor oaks were then finished off by two-lined chestnut borers.

These insect ravaged areas are now in an early successional forest stage. Are there some species we wish to encourage by creating more successional forest or will that further fragment the remnant forest and depress neo-tropical species and warbler recruitment?

Will further logging and early successional habitat also lead to more cowbirds that parasitize rare forest warbler species? This is just one more of the many things that should be considered when managing a forest for biodiversity. In a bioreserve biological diversity must come first. All other activities are secondary.

Please give serious consideration to these concerns.

Thank you,

Everett J. Castro
Director of Community Affairs

Cc – “Co-Peace” Commenters
SMB Partners