

Jessica A. Rowcroft
Bureau of Planning, Design & Resource Protection
Department of Conservation and Recreation
251 Causeway St. Suite 600
Boston, MA 02114
Re: Garnet Hill Lot Forest Management Proposal

April 1, 2017

Dear Ms. Rowcroft,

I'm writing on behalf of the Friends of Peru State Forest (PSF) and following up on my comments at the public meeting in Pittsfield on March 16 regarding the timber sale and forestry plans presented. This document refers specifically to the Garnet Hill Lot Forest Management Proposal and related issues. Please add this full letter to public comments; more information is available at www.friendsofperustateforest.org.

We recognize that Middlefield and Peru were identified in the forest vision process a number of years ago as a matched pair – one as a Woodland and one as a Reserve. We commend the original concept behind this "pairing," but we believe that for many reasons, including some that have come to light since the visioning process, additional regions of Peru State Forest should be converted to a Reserve - with monitoring, trail upkeep and additional intervention only as necessary. We urge that the Reserve at least include the area included in this proposal – it is literally the heart of the forest and has significant cultural and historical value and includes the only state-owned connection with the Middlefield Reserve. These areas should not be part of any timber sale. This would add value to Middlefield, align with the DCR goals of conservation and recreation, and preserve these resources for the long term.

In recent years Friends of PSF has been working to document the natural, cultural and historical aspects of the Forest. We have some of these on our website. You acknowledged that historical resources are not indicated on the logging maps provided nor delineated in the report. We note that one of the maps is mislabeled as October Mountain and is very poor quality. DCR staff noted that you don't want divulge the locations of historical sites as a way of protecting them. With the exception of detailed locations for species of concern or endangered species, Friends of PSF respectfully suggests that delineating historical resources is an opportunity for others to learn about the Berkshires and an added benefit to the recreational value of the Forest, which is within the mission of DCR. We look forward to comparing information to ensure these resources are protected and respected.

The goal of our organization has been to host hikes and share the unique aspects of the Forest and the history of the Berkshires. We know that this area has significant history, much of it intact, as well as amazing flora and fauna. People are always particularly impressed by the moose rubbings on trees (8 ft from the ground!) and the beautiful wetland areas at such a high elevation. We have assembled a repository of historical documents and hosted and attended several fascinating hikes in the past ~4 years, some with upwards of 20 participants. Additional hikes are planned throughout the upcoming season and 2017 is the 75th Anniversary of the plane crash; there is significant interest in this among all ages and from diverse interest groups. There are never a lot of people in the Forest at any time but a lot of people care about it. The crash site provides a quiet and private place for many to reflect and has been tended carefully for decades.

As agreed during the public meeting we will be in touch throughout this season to align our information. We have compiled a repository of readily available historical information about Peru State Forest and are working to add to it. We believe that each forest should have a central repository of information about its natural, cultural and historical resources. Given the deadline of April 2nd for comments, and the adverse conditions and weather, we simply list the content of what we expect to provide once we are able to confirm our locations on the site.

1. specific homestead locations, some with known names of owners and additional information;
2. specific aspects of their arboreal setting – typically sugar maple trees, lilacs, apples etc. These plantings are a significant aspect of the historic value of these homesteads;
3. locations of stonewalls and their integrity, particularly along a double wide carriage road, and indicating a formerly major thoroughfare;
4. confirmed wetlands and vernal pools within the planned logging area; we also note that there are at least THREE known additional stream crossings not indicated (making a minimum of 6 stream crossings!);
5. CCC projects and related aspects within and near the planned logging area;
6. plane crash memorial site and path of the crash through the forest; many small pieces are still distributed through the landscape. They are regularly added to the memorial and contribute to its ongoing value;
7. notable trees and habitats and special species

Additional general comments and specific concerns unanimous among Friends of PSF:

1. We are very concerned about potential desecration of the site of the WWII military plane crash. This site has been maintained by local volunteers for years - replacing flags, collecting pieces of the crash, picking up any trash - and is highly valued for many reasons. Logging activities around it, or on the way to it, will not improve the site and diminishes it as a place of private contemplation and enduring value as a sacred site.

2. We are very concerned about unintended consequences.

A) Logging is extremely damaging to the forest and releases a huge amount of carbon through tree removal, soil damage, equipment, transportation etc. Major publications are saying that one of the best things we can do for climate change is protect our forests. Forests do not need to be logged to be healthy, and in general older forests have the most complexity and biodiversity. These facts have become ever more clear since the forest visioning process. We suggest that plans for public forests need to be adjusted as new information comes to the fore. Climate change aside, we know our forests protect clean water and biodiversity, and both are essential. Logging impacts these negatively.

B) Logging brings more, and more serious, invasive species. Currently this is not a major problem in Peru State Forest. The project involves multiple excursions into the interior. Unless logging equipment is cleaned and there is extensive monitoring after the project this will result in much more harm than benefit to this forest.

C) There is no significant problem that the project is solving. Trees damaged by a storm are not harmful, trees falling over in the woods are not harmful, non-native trees that are not invasive are not inherently harmful, and a subset of trees having some sort of a pest (like the pine or beech trees) is not harmful in the big picture. Some trees will die and some will survive. Some will be blown over or damaged by a storm. None of the reasons given for this project are sufficient justification for a project of this scale on such a sensitive site.

3. Property owners nearby are concerned about their taxes and property values. PSF and its hiking, horseback riding and hunting are a major draw for this rural area and impact values. Residents have seen impacts of other logging projects in the area in recent decades and in other areas of the state and none were positive. People do not want tax dollars spent logging public lands. The forest provides more public benefit as an intact forest.

4. Executing this project means that the main area for recreation in Peru State Forest will no longer be a forest – literally for the rest of the lifetimes of all the people who engage in these activities, including relatives of crash victims, veterans, and relatives of those who died for our country. None see this project as improving the Forest.

5. We disagree strongly that this project will offer a net improvement to habitat or create a type of habitat needed in the area: there are other areas nearby that have had very large clear-cuts and other types of silviculture. State land is the only land that we have control over, and large intact forested areas are crucial for wildlife survival. Trees naturally break or get blown over - there is no need to intervene. The habitat you are creating supports common species. But the habitat you are destroying is a large forest at a cool high elevation that is much less common and even rare. It can help keep species in the southern end of their range as temperatures go up with climate change.

6. Habitat fragmentation is one of the greatest threats to biological diversity, and large undeveloped forested areas help mitigate threats to biodiversity. Corridors between important wildlife habitat areas allow animals and birds to travel from one area to the next increasing the chances of survival for those species. This project severely impacts the only state-owned corridor across Rt. 143 connecting between the Peru and Middlefield forests. Large areas will be clear cut (one is 58 acres, with many smaller clear cut areas). It was our understanding that this should/would trigger an additional level of environmental review?

7. We had planned a series of Boy Scout trips, historical documentation, film projects, and potential trail restoration projects, of course with permission, to improve access and visibility of this forest. These projects will enhance the property values in Peru and the recreational value of the forest; this logging project will decrease them. The planting of the Norway Spruce is itself a part of the history of the site. It is in a small area and there is no need to remove it.

8. Peru has the highest mean altitude in the state, which is a draw for tourism and recreation. Garnet Peak is one of the top ten highest peaks in the state. We know there is a steady stream of visitors from a wide geographic area.

9. The area is a very wet upland area. Because of the large amount of rock in the substructure of the mountain there is poor drainage and an incredible network of wetlands and vernal pools even at the highest elevations. Massachusetts has very strict laws around wetlands and we assume that that a detailed mapping of these and other ecological features (flora, fauna) will be performed during multiple seasons prior to finalizing any plans. Even if “sensitive” areas are avoided there will be a massive change in the water flow and amount of erosion to downhill water resources and into the watershed of the Wild and Scenic Westfield River. The area of the timber sale is bordered by slopes, some very steep, and leading to a brook below.

In sum, we believe that Peru State Forest is forest is a perfect showcase for the region as it is rapidly entering an old growth-like condition while retaining its extensive and unique cultural history that attracts a wide variety of visitors – recreation, hunting, history, remembrance and reflection. It is amazing to have this resource within our state. This project will damage the integrity of all of these values. We note that DCR's mission is "*To protect, promote and enhance our common wealth of natural, cultural and recreational resources for the well-being of all.*" We thank you for your consideration and are very committed to providing you additional information so that all goals related to the public good can be addressed.

Respectfully submitted,
Susan Masino, on behalf of Friends of Peru State Forest