



## ***Department of Conservation and Recreation***

### ***Stewardship Committee***

***September 8, 2017***

#### ***Executive summary:***

Communication and events regarding proposed management of and on-site activity at Peru State Forest (Peru, MA) are outlined. These events and examples precipitate specific suggestions for Department of Conservation and Recreation (DCR) to best reflect the agency's mission and achieve a more stable, positive and visible public image. They also align DCR policies 1) with the latest science; 2) with more sincere and thorough efforts to reach out to and respond to the public; 3) with resource management strategies that best support mental and physical health; and 4) with the highest respect for the past, present and long-term future of historical, cultural and natural resources held in the public trust.

Most importantly, DCR should avoid any possibility of desecrating historical, cultural and natural resources now held on public land and in the public trust. DCR has a special responsibility for rural areas – they may have the most infrequent and least complete documentation, and have little oversight - yet constitute some of the largest and wildest blocks of land. DCR should propose current and future timber sales on the Commonwealth's public land only as necessary and in areas designated as and best suited for tree farms/plantations; limited sporadic intervention using specific silviculture techniques may be appropriate or needed in some areas for specific goals. All State forests should be evaluated as partially or wholly suitable as self-sustaining – not needing chronic intensive maintenance – and designated publically by DCR. Together these efforts will provide economic relief to DCR and public forests with the biggest benefits for health, the environment and resource management.

Friends of Peru State Forest (FOPSF; [www.friendsofperustateforest.org](http://www.friendsofperustateforest.org)) respectfully suggests, as in previous public comments, that logging be redirected away from the core of this rural forest – Garnet Hill is a rare wet high elevation habitat, connects to to the Middlefield Reserve, and is a highly visited area holding its historical and cultural value (see website). Wetlands, stone walls and stream crossings leading to a military crash site and damaged recently by vehicle tracking and debris should be restored ASAP. We would be happy to discuss further and provide background, information and suggestions below. Additional documentation provided upon request.

## Background, Information and Suggestions

Friends of Peru State Forest (FOPSF) formed officially in 2014 after participating for several years in large public and small private group hikes and informal cleanups. The Friends group is registered with the State and has a loosely organized membership that includes the local community; members are also from across the state and surrounding states. We have networked with other Friends groups, and are working toward non-profit status.

In March 2017 we learned (via word-of-mouth) of a DCR public hearing on a proposed logging project on Garnet Hill. Representatives of FOPSF and Peru Historical Commission attended and expressed concerns about historical resources, vehicular access, and water resources (and watershed of the Wild and Scenic Westfield River). At the meeting the location of the area to be logged and the extent of the project was difficult to determine.

We agreed to be in touch with DCR and send information about historical/cultural resources and wetlands and vernal pools collected during the season – logging was not planned until at least late fall or winter. We followed up with forester Kris Massini and he promptly sent a copy of his presentation. To our dismay the higher resolution map made it clear that the 280 acre proposed logging area included one large (~60 acres) and many small (~3-5 acres) clear-cut areas encompassing the entire core area for recreation and the top of the mountain, including around a WWII military crash site (which is highly visited), the peak lookout area, old homesteads and their settings, and the intact stone work done by the Civilian Conservation Corps (CCC) – a topic of intense interest - and which includes the main access road and many watering holes. The “desired condition” was alarming. Several documented stream crossings were not indicated even though they are on the map provided.

FOPSF compiled detailed comments as quickly as possible, submitted them, and went out multiple times documenting vernal pools, homesteads, and the general structure of the forest as agreed at the Public Hearing in March. Other individuals and groups submitted additional comments - yet they are not reflected in the public record. Overall we disagree with the rationale and potential net benefits of the project (salvaging commercial value of dying trees, dealing with a beetle or bark issue, establishing this as a demonstration “regeneration” forest, growing native trees for commercial thinning in 50 years, generating early seral habitat). This is a harsh environment that is self-thinning - an unsuitable place for the State to plan to grow trees as a demonstration project or for future harvest. Early seral habitat is not native and is in decline because of previous deforestation – and there are already hundreds of acres nearby. The damage that will be done to a historical cobblestone road and landmarks and other unique values of this forest to the public outweigh timber sale income and are not in the public interest. Examples of objections are comments submitted here and during the Forest Visioning process - and an explosion of interest in books like *“Nature’s Temples,” “The Nature Fix”* and *“The Hidden Life of Trees.”* There is a groundswell of interest in current (and future) Old Growth Forests, “wild” areas, guided forest hikes, sensory hikes, historical hikes, forest bathing (Shinrin yoku), forest-based education and nature therapy.

We received no response from DCR. In late August, by accident, we found on-line responses (attached). They are incomplete (one FOPSF letter, and at least two other thoughtful letters - that we know of - were ignored entirely). The connotation of some comments is misrepresented; some responses are irrelevant or misleading.

Shortly after submitting our comments, the Peru Historical Commission and Town of Peru initiated an event in honor of 75<sup>th</sup> anniversary of the plane crash. FOPSF had, since 2016, planned a public hike/remembrance which would include boy scouts and a DCR interpreter. FOPSF cancelled to join forces when we learned of this effort.

Not unexpectedly there was evidence of driving on the trail to the monument (May, June); this has sometimes happened in the past. However the amount of driving became excessive and the types of large wheeled vehicles became severely damaging to the streams and wetlands in late June – mid July. As a separate issue (not FOPSF's) we now know that a DEP complaint was filed sometime in July (?). But the damage continued and got much worse: by August 12 damage to the original trail was extensive and expanded – massively rutted and impassable, evidence of large wheeled vehicles off and around the previous trail, all streams silted in. Clearly multiple failed attempts to make the previous trail passable and establish stream crossings with logs, rock and debris were simply abandoned as unworkable. New sections of trail now avoided these areas (the old trail was brushed off) and rudimentary crossings installed to support extensive vehicular traffic on the day of the event.

On August 15 the 75<sup>th</sup> remembrance event was held on mountainside. It went well. The video is available on YouTube at <https://www.youtube.com/watch?v=B5dA51bt1yE>. Peru Historical Commission remarks are provided herein. The original trail to the monument was brushed off to prevent access and in some cases literally hide the damage. In the new sections large sections of the historical stone walls were driven over, or moved aside, and covered with extensive debris; debris was used to fill in a wetland crossing; stream beds and channels on the new section had rudimentary crossings and were silted in completely - no water flow.

On August 22 FOPSF submitted a follow up to DCR thanking them for helping to make the event happen but noting that 1) signage indicating no motorized vehicles was missing (signs were still intact on the day of the event, but gone shortly thereafter) and 2) there was an urgent need to repair the damage and limit vehicular access. No response was received but signage was replaced by August 27. Damage was/is still extensive.

FOPSF has no idea what the plan is for restoring or logging this area. However even on one very limited visit this spring we found two active and viable vernal pools and at least two others with live but unhatched wood frog eggs in the logging area. We continue to advocate for this area of Peru State Forest: it is the only connection to Middlefield Reserve; it has extensive evidence of the work of the CCC, and incredible natural and historical resources. It is an icy harsh environment and there is natural thinning of the trees and opening of the canopy - giving the forest a unique character. It is rocky and wet.

In summary, this core area is not appropriate for current or future logging of any significant scale. Trees will regenerate when current trees die; some trees will survive a beetle or bark infestation and provide resilient future stock. The non-native tree species (i.e. Norway Spruce) are not invasive – they are either dying or self-thinning, and are a historical remnant. Native trees will grow in their place and this process has already begun naturally. There is no problem with invasive species or disease in the forest. And a true landscape approach should consider land use on adjacent or nearby public and private land that already accomplish the stated goals.

### ***General Comments and Suggestions:***

The designations of reserves, woodlands and parks as a “landscape” approach by DCR is laudable but designations should be revisited in light of new evidence – particularly for areas which did not receive comments during that process. Peru State Forest was considered for inclusion as part of the Peru-Middlefield Reserve: no comments were received and it remained “woodland.” Current reserves are too few and many are poorly accessible. Additional areas throughout the state should be considered for public designation as reserves.

DCR should reach out to relevant local communities and Friends’ groups before proposing a logging project. Friends’ groups often have the most detailed local information and can be considered free advocates for DCR and volunteers for the State. The local community knew nothing about the previous visioning process, and FOPSF was taken by surprise by the logging plan (and its extent) – even though we are fully registered since 2014 and have been working to document and catalogue (on a public website) all the values in this part of PSF.

Clearly a better mechanism for public outreach and a longer comment period is needed. A comment period held in the middle of the winter when the forest is simply inaccessible is a hardship – even getting to a public meeting in March was a challenge. Peru is at a high elevation and the winter is long and hard.

The public process gives FOPSF the impression that DCR does not want the public to know what it is doing. In addition to randomly learning about the hearing and the project, it seems that there is no interest in the content of the comments that were received or in responding to them honestly. There should be a policy of posting all submitted comments; we requested this specifically. Despite this request, specific comments and entire letters were ignored. Responding to selected aspects of submitted comments is insincere and inaccurate.

DCR should notify those who submitted comments when DCR’s responses are posted. It is unreasonable that the public is left guessing and checking to see what the responses are and if/when their concerns will be addressed.

The State should not be logging the Commonwealth’s most rural and previously uncut areas unless it is a designated tree farm or tree plantation – public lands are the only places that we can control and protect as unmanaged forests; “getting away from it all” is a priceless experience for citizens and tourists, and unfragmented forest is a critical type of habitat. Young, regenerating forest is in decline because of previous deforestation, and forests that have not been cut in 80-100 years (or more) should be considered for transition to self-sustaining – and eventual old growth status. This is the most rare habitat type, and public forests are the only places we can protect reliably. That is aligned with your mission. State logging should focus on areas suitable for tree farms or specific “wildlife management areas.” By being explicit and honest the state could reap the dual positive benefits of logging suitable areas efficiently and advertising unmanaged areas to the public.

Immediately, the state should stop logging areas with valuable cultural, historical and natural resources and consider their suitability as self-sustaining forests. This is public land and the public trust, and their value is in their existence - mental and physical health benefits, environmental benefits clean water, clean air, and historical preservation - not in their extraction. Unfragmented forest area and an undisturbed forest floor are critical for many types of wildlife and it takes many, many decades for the ecosystem to recover from a logging project. As possible DCR resources for self-sustaining areas should be devoted to education and monitoring for safety, invasives, and other adverse conditions – as well as ongoing data collection and assessment.

***Specific suggestions regarding Peru State Forest:***

Do not log the proposed area of the forest that is accessed by Garnet Hill Rd. It is not an efficient timber resource and is not justified environmentally. It is the main public area of the forest, established as a major State Park recreational area by the CCC. Hundreds of nearby acres have been clear-cut recently or “managed for wildlife.” Forest management benefits some species and harms others. PSF is self-sustaining due to extreme weather conditions (naturally opening the canopy when trees break/die). There is no problem to solve.

Combine the proposed logging area with the Middlefield Reserve and gain positive public accolades – many people went to the 75<sup>th</sup> Remembrance event. They do not support logging around this sacred area and do not see a benefit to the public.

Remove debris and silt and restore stream crossings and wetlands as soon as possible. This is urgent.

Thank you for your time, attention and consideration.

**Attachments:**

Complete comments submitted by FOPSF and RESTORE

DCR Response to comments

Remarks given at the 75<sup>th</sup> Remembrance event (Susan Masino)

Follow up note to DCR after Remembrance event

**Links:**

Friends of Peru State Forest:

[www.friendsofperustateforest.org](http://www.friendsofperustateforest.org)

Comments posted and DCR Responses:

<http://www.mass.gov/eea/docs/dcr/stewardship/forestry/manage/forest-product/winter-spring-2017-general-forestry-comments-and-responses.pdf>

75<sup>th</sup> Remembrance Event on Garnet Peak:

<https://www.youtube.com/watch?v=B5dA51bt1yE>

Status of logging projects:

<http://www.mass.gov/eea/docs/dcr/stewardship/forestry/manage/forest-product/project-status-list-july-21-2017.pdf>.



“Desired condition”