

Massachusetts Environmental Energy Alliance

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July 14, 2009

Commissioner Rick Sullivan
Department of Conservation and Recreation
251 Causeway Street, Suite 600
Boston, MA 02114-2104

Dear Commissioner Sullivan,

MEEA is a western MA organization that represents various groups and individuals interested in environmental energy issues in the Commonwealth and particularly in western Massachusetts.

As you are certainly aware, DCR has been working hard to create forestry plans for harvesting state forests and parks in all eight of its districts. So far, four district plans have been prepared, each containing a maximum acreage that can be treated in any one year. The remaining district plans are expected to reflect the same approach. Interested parties have a variety of problems with these plans, such as the acreage set for harvesting, the absence of unit plans, the need for full-scale management plans, etc. etc. However, many agree that setting an annual cap in the cut is a good idea, notwithstanding various opinions concerning what the cap should be. Therefore, we applaud the effort DCR is making.

In the course of meetings held under the "forest visioning" process, it appears to us that not all of the forestry attendees are fully aware of these harvesting limitations. Repeated references are made instead to studies prepared for the Department of Energy in past years, particularly to the 2007 study by Kelty et al entitled "Silvicultural and Ecological Considerations of Forest Biomass Harvesting in Massachusetts" and the slightly earlier study by Innovative Natural Resource Solutions entitled "Biomass Availability Analysis – Five Counties of Western Massachusetts." Those studies postulated that over half of the wood for proposed biomass-burning plants would come from the 80% of the public forests and parks not set aside as "reserves".

Since the DCR's approved regional plans supersede these two chapters of the DOER biomass availability analysis, it would be most damaging to DCR and a source of public dispute if any of the proponents or investors in these plants were to claim reliance on the DOER studies. We ask you therefore to insure that the cutting limitations on public lands are made clear to everyone in the Commonwealth. DCR and DOER personnel should accordingly promote the data in the plans and not the earlier studies.

We look forward to receiving a response to this letter, including a plan for 1) completing the forestry plans as soon as possible and 2) telling the world about it. Thank you for your attention to this important component of DCR's forestry planning.

Sincerely,

Alexandra Dawson, President of MEEA