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Bob Durand, Secretary
Executive Office of Environmental Affairs
251 Causeway St.
Boston, MA 02114

Subject: Citizen's complaint pursuant to General Laws Chapter 30, Section 61 asking
MEPA review of DEM's planned activity at Manuel F. Correllus State Forest

August 6, 2001

Dear Secretary Durand:

Thank you for your recent announcement this June concerning the implementation of certain management activities at the 5,252-acre Manuel F. Correllus State Forest (MCSF). For much of the last 15 years, I have worked as a scientist exploring the offshore islands' threatened natural communities and their management requirements. I also serve on the board of directors of one of the Vineyard's local conservation non-profit organizations.

I am the biologist responsible for discovering and documenting 18 out of 29 state-listed threatened species at MCSF. I feel strongly that responsible management of the forest should be ensured, and I was heartened to hear that consensus may have been reached on managing what biologists agree is one of the Commonwealth's most valuable natural assets.

I must report that my optimism was premature. For the sake of the integrity of this important natural resource, I ask that you exert your considerable leadership skills in a timely way to avoid a sorrowful mis-direction in the management of this extraordinary property. The current direction will, in my opinion, result neither in the maintenance of public safety from wildfire nor in the protection of threatened wildlife.

I began formally to inventory threatened species on the property in 1987, and discovered populations of many species that have either been extirpated from the region or simply have never been recorded from anywhere else in New England. In subsequent years, I undertook the wildlife inventory of the roughly 800 acres that were ultimately added to the forest proper. My documentation of numerous threatened species there helped to facilitate that expansion of the Correllus forest. Simply put, the Correllus forest is globally unique in ecological terms. It should be considered among the region's preeminent natural areas with respect to conservation priority.

It has always been my belief that the twin goals of wildlife management and maintenance of public safety can absolutely be pursued in tandem, and that there is no factual basis for any suggestion to the contrary. The techniques most likely to achieve the goals of one can easily be used to achieve those of the other. These preferred techniques should include a combination of mechanical (e.g. mowing) treatments and prescribed burning.

In contrast, the use of harrows and bulldozers in this area will, in my opinion, accomplish neither of these goals. This is partly because harrowing promotes the growth of pitch pine, one of the more dangerous fuels in the area. These and other concerns shared by scientists who have extensive experience on this property have been reiterated for several years. But despite the existence of a “draft management plan” that has been neither modified nor updated in almost seven years, there remains not a single indication that either a fire management plan or a detailed conservation and monitoring plan exists.

To date, the only significant responses to these concerns on the part of DEM personnel have involved the mischaracterization that conservationists have called for the maintenance of scrub oak monocultures (a highly dangerous fuel) and the “independent study” alluded to in the Vineyard Gazette purporting to demonstrate that harrowing encourages less build-up of such dangerous fuels than other techniques. In fact, that report was co-supervised by DEM personnel. I have reviewed DEM's data contained in that report, and I can attest that the study was fatally flawed in its design. Among other omissions, the report contains no discussion, conclusions, or recommendations, and no exploration of the effects of prescribed burning, despite the availability of two areas subjected to previous test burns. You should know that its conclusions offer an insufficient basis for sound decision-making.

Regarding specific management goals, the notion that the needs of threatened species—even those that depend on habitats where scrub oak occurs—involve homogeneous stands of this shrub is ill-founded. In fact, the needs of these species are no better served by the maintenance of unnaturally high fuel loads than the needs of fire safety. Responsible management through a combination of mowing, selective tree removal and prescribed burning would serve both ends efficiently.

It is unfortunate that DEM personnel have portrayed the issue as one in which the needs of wildlife and human safety are at odds, capitalizing on the public's fear of wildfire in order to highlight the urgency of reducing wildfire potential at the expense of, rather than in concert with, responsible wildlife management. The simplistic public portrayal of oak barrens habitats as dangerous fuels, when combined with the implication that conservationists would ever wish to maintain monotypic scrub oak stands, appears to be designed simply to justify the use of the harrow and bulldozer. The latter implication is a red herring, one which has served only to shift the onus of wildfire prevention to the conservation community while avoiding obvious and immediate management priorities. Those priorities include the reduction of fuel loads in the decrepit former pine plantation areas of the forest and the removal of crown fire-prone canopy trees from scrub oak-dominated areas which DEM has admitted constitute serious fire hazards. I find the use of the false dichotomy of conservation versus fire safety distasteful, irresponsible, and

particularly reckless given the complexity of the issue and DEM's long history of avoiding obvious management needs despite repeated opportunities.

Two years ago, you publicly endorsed the findings and suggestions of the study by Dr. David Foster and Glenn Motzkin devoted to the historical ecology and management of MCSF. That study flatly discounted harrowing and bulldozing as a primary ecological restoration tool, calling for less damaging methods. It is unclear from your recent statements whether your endorsement of that position has shifted.

Therefore, I most respectfully ask that you consider this letter a citizen's complaint pursuant to the provisions of the Massachusetts Environmental Policy Act (MEPA) against the Department of Environmental Management (DEM) concerning these proposed management activities at MCSF. MEPA requires state agencies to take all feasible measures to avoid, minimize and mitigate damage to the environment. It is my opinion that such measures are not currently being pursued.

To date, no fire management plan has been drafted or implemented for MCSF, nor has any conservation plan or habitat management plan. No plan exists to monitor the impacts of DEM's management activities on the forest's threatened species, including those listed under the provisions of the Massachusetts Endangered Species Act. As you know, in carrying out agency activities like DEM's proposed work at MCSF, the MEPA statute requires review, evaluation and determination of impact on the natural environment.

Please understand that calls for such review are not new. For several years, I and many other biologists and resource managers have repeatedly and in writing asked DEM to (1) revisit the forest's long-term fire management and wildlife management needs, (2) convene the forest's advisory committee (which to my knowledge has still not met in many years), and (3) draft and implement a fire management plan, a measure considered fundamental in fire-prone and fire-adapted natural areas. None of these things has happened.

If pursued properly, MCSF can easily be one of the Commonwealth's greatest conservation success stories. Your support of action through the MEPA process will ensure that responsible management for both public safety and natural resources occurs at MCSF. Thank you for your attention to this matter.

Sincerely,

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cc: Jay Wickersham, MEPA Unit

