



# MAINE'S BIG, OLD TREES AT RISK

from Administration's Plan to Increase Logging on Public Lands



Natural Resources  
Council of Maine

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## **Maine's Big, Old Trees at Risk: From Administration's Plan to Increase Logging on Maine's Public Lands**

### **Executive Summary**

The 400,000 acres of Maine's public forests that are managed for commercial timber constitute less than 3% of the state's 17.6 million acres of timber lands. These lands include wildlife habitat important for a broad range of species and provide high quality recreational opportunities for Maine people. They also produce high value forest products. For these reasons, the state has mandated that the lands be managed as "multiple use" forests.

Internal LePage Administration documents, secured by the Natural Resources Council of Maine (NRCM) through requests to state agencies,<sup>1</sup> reveal that the Administration in 2012 proposed to increase the harvest on Maine's publicly owned forests by 61%, from the scientifically calculated "Sustainable Harvest Level" of 141,500 cords/year to 227,732 cords/year.<sup>2</sup> This increased logging would reduce the amount of standing timber, including the amount of bigger and older trees, on public lands. Increasing the harvest as planned by the Administration would have serious adverse economic, ecological, and recreational impacts on Maine's public forests.

The increase in harvest proposed by the Administration represents a change in policy that would reverse decades of high quality forest management by state-employed professional foresters designed to increase the overall amount, age, and value—both ecological and economic—of the state's publicly owned forests.

The planned increase in logging was developed by Administration officials who have no legal authority over Maine's public lands, without consulting the professional foresters who manage the state's public forests, and without any notice to the public. Once the officials legally responsible for managing the state's public forests learned of the plan, the Administration's plan to overcut was scaled back to 180,000 cords/year. This is still an increase of 27%, and means that logging on public forest lands would be happening faster than the harvested land is growing back.

The Administration's proposed increase in harvesting threatens high quality wildlife habitat, particularly mature habitat, and would adversely affect wildlife species that need mature forests. It would likely degrade backcountry recreation experiences, and it would decrease the amount of high quality mature timber for which Maine's public forests are currently known.

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<sup>1</sup> The information in this report is based on documents provided to NRCM in September and October 2013 by the Bureau of Parks and Lands and the Maine Forest Service, in response to a formal request for information. On Nov. 5, 2013, NRCM requested from Governor LePage's Office additional documents related to harvesting on public lands, pursuant to the Freedom of Access Law. As of March 10, 2014, the Governor's Office has failed to provide any documents in response to this request.

<sup>2</sup> All figures in this report are based on calendar years, the method historically used by Bureau of Public Lands (BPL) to report harvest levels. As of FY 2013, BPL has begun reporting harvest levels based on a July 1 – June 30 fiscal year.

NRCM recommends that the Administration's proposed increase in harvesting to 180,000 cords/year on public lands be rescinded. The Bureau of Parks and Lands (BPL) should determine harvest levels for public lands based on the most recent Forest Inventory Analysis figures, and BPL should provide meaningful opportunities for public comment prior to moving forward with any increase in timber harvesting beyond the Sustainable Harvest Level of 141,500 cords/year.

## **Previous Policy - Grow big, old trees**

Maine has about 600,000 acres of forest in the North Woods that are managed by the Bureau of Parks and Lands. The vast majority of these lands were conveyed to the State of Maine through the Articles of Separation, whereby Maine and Massachusetts separated in 1820. In 1973, the Maine Supreme Court approved management goals for these lands, which include timber harvesting, ecological and wildlife protection, and recreation.<sup>3</sup> By law, BPL must adopt and follow a comprehensive management plan for these lands.<sup>4</sup>

BPL's management plan for all of Maine's public lands is the Integrated Resource Policy, a document adopted in 1985 after extensive public comment. The Integrated Resource Policy was most recently revised, again after extensive public comment, in December 2000.<sup>5</sup> Under the Integrated Resource Policy, timber harvesting can occur on about 400,000 of the 600,000 acres of public lands (while the other areas are managed for ecological and recreational goals that do not include timber cutting). These 400,000 acres constitute less than 3% of the state's 17.6 million acres of timberlands.

The Integrated Resource Policy sets forth a number of goals regarding the timber resource, including:

- "[M]aintaining an adequate area in mature forest of mid and late successional character;"<sup>6</sup>
- "Retention of primary forest and old-growth;"<sup>7</sup>
- "[G]rowing the largest/oldest trees consistent with species and site;"<sup>8</sup>
- "[I]dentify stands with mature components of long-lived tree species . . . to provide connectivity of habitats for plants and animals which benefit from this forest condition."<sup>9</sup>

Mature, late successional and old-growth forests, including big, old trees, provide a variety of public benefits including wildlife habitat protection, recreation opportunities and carbon storage.<sup>10</sup> BPL's goals are consistent with the need to protect and increase the amount of mature, late successional and old-growth forest in northern Maine.<sup>11</sup>

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<sup>3</sup> 12 M.R.S.A. §1847 (1); Opinion of Justices, 308 A.2d 253 (Me. 1973).

<sup>4</sup> 12 M.R.S.A. §1833 (2) and §1847 (2).

<sup>5</sup> Integrated Resource Policy, Maine Department of Conservation, Bureau of Parks and Lands, Dec. 18, 2000.

<sup>6</sup> Id. at 68.

<sup>7</sup> Id. at 69.

<sup>8</sup> Id. at 69.

<sup>9</sup> Id. at 69.

<sup>10</sup> Mark J. Ducey, John S. Gunn, and Andrew A. Whitman, *Late-Successional and Old-Growth Forests in the Northeastern United States: Structure, Dynamics, and Prospects for Restoration*, Forests 2013, 4, p. 1055-1086; Nov. 26, 2013.

<sup>11</sup> Id.

BPL foresters have worked hard over the past 30 years to achieve these goals, and they continue to do so successfully. Between 1999 and 2011, BPL increased the amount of standing timber on its lands by 10% while continuing to harvest sustainably,<sup>12</sup> protect wildlife habitat, and provide high quality recreational opportunities for Maine people. BPL is audited annually by the Forest Stewardship Council, an independent, international forest certification system, and has, in the past, been found to be in compliance with sustainability, ecological, and social requirements.

## The Plan to Increase Logging

On Oct. 22, 2012, the Maine Forest Service (MFS) proposed in a memo to the Governor's Office that logging on Maine's public lands should be immediately almost doubled over the level of logging that occurred in 2012.<sup>13</sup> The Maine Forest Service has no legal authority over the management of the state's public lands. That authority rests with the Bureau of Parks and Lands.<sup>14</sup>

The MFS proposal would have dramatically increased logging on public lands to a level well beyond the Sustainable Harvest Levels calculated by BPL's foresters. Based on a recent inventory of the timber resource, BPL had established 141,500 cords/year as their Sustainable Harvest Level for 2013<sup>15</sup> (up from an actual harvest of 128,000 cords in 2012).<sup>16</sup> The MFS proposal to the Governor's Office, however, called for BPL to cut 227,732 cords/year—a 78% increase over the 2012 level, and a 61% increase over the Sustainable Harvest Level.<sup>17</sup> MFS's proposal was designed to decrease the amount of standing timber on the state's lands.

As a result of excellent management over several decades, and consistent with their publicly adopted policies to grow big, old trees, BPL had increased the amount of standing timber on public lands to 23 cords/acre. The MFS wanted to reduce standing timber on these public lands to 20 cords/acre.<sup>18</sup>

The Maine Forest Service did not share their Oct. 22, 2012 proposal with the professional foresters and land managers at the Bureau of Parks and Lands, nor did they share a subsequent related memo.<sup>19</sup> The first time BPL's forest land managers officially heard about the proposal was in April 2013, six months after the proposal had been made to the Governor's Office.<sup>20</sup>

## Decisions Made in Private

When the Bureau of Parks and Land's Integrated Resource Policy was revised in 2000, the public was given a significant opportunity to provide comments and respond to the draft document. A stakeholder group of 20 or more individuals representing a variety of timber, conservation, ecological,

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<sup>12</sup> BPL, *Data Stratified by Forest Ownership*, from MFS 2006 midcycle report and 2011 data. [Reference 1]

<sup>13</sup> Maine Forest Service Memo, October 22, 2012 [hereinafter "MFS Oct. 22, 2012 Memo"]. [Reference 2]

<sup>14</sup> 12 M.R.S.A. §1847.

<sup>15</sup> BPL, Sustainable Harvest Levels, 2012 Modeling, "The version given to the auditors in Nov. 2012." [Reference 3]

<sup>16</sup> BPL, Memo, "Ramping up to the Increased Harvest Level of 180,000 Cords per Year" [Reference 4]

<sup>17</sup> MFS Oct. 22, 2012 Memo, p. 1. [Reference 2]

<sup>18</sup> Id. at 1.

<sup>19</sup> MFS, *Summary: MFS Support for BPL Harvesting Activities*, undated [Reference 19]

<sup>20</sup> Tom Morrison, Personal Communication, October 2013.

and recreational interests met multiple times to discuss the Policy. Draft changes to the Integrated Resource Policy were circulated among group members, and BPL provided multiple opportunities for public comment, both in writing and orally, about the planned timber management goals as well as other policy proposals in the draft.

In contrast, the Maine Forest Service's Oct. 22, 2012 memo recommending a major change in Maine's public land management policy was not shared with the public, the Legislature, or even with BPL, the agency responsible for developing and implementing the policy. It appears that the only communications that occurred about the proposed ramp-up in timber harvesting on public lands were between the Maine Forest Service and staff in the Governor's Office.

On Thursday, April 11, 2013, staff from the Governor's Office sent an email to both BPL and the MFS asking a variety of questions about timber harvesting on public lands. One of the six questions asked was about the amount of revenue that could be generated by increased harvesting.<sup>21</sup> The Governor's Office requested agency responses by April 17, 2013.

Multiple documents acquired by NRCM from BPL and the MFS through formal document requests indicate that between Monday, April 15 and Wednesday, April 17, 2013, a major negotiation took place between the Maine Forest Service, the Bureau of Parks and Lands, and the Governor's Office.<sup>22</sup> BPL initially proposed answers to the questions, which did not include increasing harvest levels beyond the 141,000<sup>23 24</sup> cords/year Sustainable Harvest Level calculated in 2012.<sup>25</sup>

A later, undated memo entitled "Areas of Compromise/Conflict Between BPL and MFS Reports" by the Maine Forest Service describes some of the issues involved in the negotiations that resulted in a "compromise" agreement to increase harvest levels from 141,000<sup>26</sup> cords/year to 180,000 cords/year over the next three years. The "compromise" also included an agreement to continue logging at that higher rate (180,000 cords/year) for 20 years in order to reduce the standing inventory on public lands from 23 cords/acre to 21.5 cords/acre.<sup>27</sup> An April 17, 2013 memo by the MFS outlines the compromise that would increase logging on public lands beyond the previously calculated Sustainable Harvest Level for 20 years and decrease the amount of standing timber.<sup>28</sup> Despite multiple memos<sup>29</sup> by BPL staff expressing concern about the impacts of increased harvest levels on the timber supply, ecological characteristics, and recreational experiences on public forestlands, the Director of BPL signed the April

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<sup>21</sup> Carlisle McLean email, April 11, 2013. [Reference 5]

<sup>22</sup> BPL, Draft of Response to Governor's Office, April 15, 2013 [Reference 6]; MFS edited version of BPL's Draft of Response to Governor's Office, April 15, 2013 [Reference 7]; Emails between Will Harris and Doug Denico, April 17, 2013. [Reference 8]

<sup>23</sup> The actual Sustainable Harvest Level calculation is 141,500 cords/year. See text accompanying footnote 15. In the document referenced here, it appears that the writer is simply rounding that figure to 141,000.

<sup>24</sup> See footnote 23.

<sup>25</sup> BPL, April 15, 2013 Draft Response to Governor's Office. [Reference 6]

<sup>26</sup> See footnote 23.

<sup>27</sup> MFS, *Areas of Compromise/Conflict Between BPL and MFS Reports*, undated. [Reference 9]

<sup>28</sup> Letter to Carlisle McLean from Doug Denico and Will Harris with attached final agreement, April 17, 2013. [Reference 10]

<sup>29</sup> BPL, *Potential Policy Implications of Major Increase in Harvest to Decrease Inventory*, undated [Reference 11]; BPL, *Increased Harvests – Raising SHL to 150,000 Cords, Effects on Silviculture and Other Things*, undated [Reference 12]



17 memo, apparently knowing that BPL had, at least, been able to head off the more harmful proposed increase contained in the original MFS proposal.

Most of these internal documents were unsigned and undated, but the outcome is very clear: the state's policy for managing our public forest lands was radically altered during a 48-hour period in April 2013, upending a three-decades-old policy to *increase* the amount of standing timber and grow bigger, older, more valuable trees, and no opportunity for public comment was provided or contemplated by the Administration at the time of this major change, nor since.

## **Closed-Door Decisions Threaten Certification**

The Administration's failure to provide an opportunity for public comment on its major change in harvesting levels on public lands could jeopardize the sustainable harvesting certification awarded to these lands. For more than a decade, Maine's public forests have been certified as sustainably managed by the Forest Stewardship Council. The Forest Stewardship Council is an international, independent, non-profit certification organization that has economic, environmental, and social criteria that must be met to achieve certification. Maintaining Forest Stewardship Council certification on the State's public lands has provided independent third-party assurance to Maine people that the lands are being managed responsibly. Forest Stewardship Council certification may also provide additional economic value to the State through higher prices for harvested wood, and the ability to sell this timber to markets specifically seeking certified wood products.

The Forest Stewardship Council requires managers of publicly owned forests to provide "clearly defined and accessible methods for public participation . . . in both long and short-term planning processes, including harvest plans and operational plans."<sup>30</sup> Neither the Bureau of Parks and Lands, the Maine Forest Service, nor the Governor's Office provided any public information or opportunity for public comment about the increased harvesting plan before it was adopted on April 16, 2013.

The Forest Stewardship Council, in its annual audit in November 2013, noted the controversy, including the lack of public input, around the proposed increase in harvest levels.<sup>31</sup> The Forest Stewardship Council issued two "Observations"<sup>32</sup> relating to public participation in harvest plans and sustainable harvest levels, which the Bureau of Parks and Lands must address or they risk losing their certification in 2014.

## **Forest Management Driven by Politics, Not Science**

The decision by the Bureau of Parks and Lands to increase the harvest level on public lands from 128,000 cords/year in 2012 to 141,500 cords/year in 2013 was based on silviculturally accepted modeling using the most recent data in the Forest Inventory Analysis.<sup>33</sup> By contrast, the decision to

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<sup>30</sup> Forest Stewardship Council Indicator 4.4.d for Public Forests Consultation. [Reference 13]

<sup>31</sup> Forest Stewardship Council Surveillance audit no. 2, Jan. 24, 2014, p. 49. [Reference 13]

<sup>32</sup> Id. at 53.

<sup>33</sup> BPL, Sustainable Harvest Levels, 2012 Modeling, "The version given to the auditors in Nov. 2012." [Reference 3]

then increase harvest levels to 180,000 cords/year over the next three years was entirely political. As revealed in BPL's correspondence with the Governor's Office, the Administration decided to increase harvest levels first, and then find a justification: "We need to develop a plan to ramp up to the new [harvest] level with key components to include: developing a rationale for the increased harvest levels that will satisfy our certifiers to maintain our forest sustainability certification..."<sup>34</sup>

Internal memos suggest that the Administration was motivated to push for increased logging on Maine's public lands in order to generate cash. For example, the Oct. 22, 2012 memo from the Maine Forest Service to the Governor's Office complained that the current Bureau of Parks and Lands forest management strategy is "hold[ing] public money hostage."<sup>35</sup> No recognition was made of the fact that the BPL management was based on science and inventory data.

At least one potential use of funds to be generated by increased harvesting was an initiative to provide financial incentives for the use of wood pellet furnaces, proposed by the Governor at about the same time (April 2013) that the MFS was pushing a proposal with BPL for a 61% increase in logging. The wood pellet furnace rebates were to be provided using a revenue bond that would be financed through sale of timber harvested on public lands, as proposed in LD 1468, a priority of the Governor, according to Patrick Woodcock, Director of the Governor's Energy Office.<sup>36</sup> On April 23, Woodcock sent Will Harris, Director of the Bureau of Parks and Lands, an email stating: "we have been working on an initiative to modify how the revenue from timber harvest of state lands would be utilized...[T]he intent is to... utilize funding beyond that base level [for BPL operations] for addressing heating costs through a conversion to biomass heat... the state would divert that funding to this new initiative."<sup>37</sup> LD 1468 was introduced on April 30, 2013.

It also appears that the Maine Forest Service has a strong interest in reducing the discrepancy between the amount of standing timber on public lands (which are managed for public values, beyond just cutting timber) and industrial forestlands. The MFS Oct. 22, 2012 memo notes that reducing the inventory on public lands to 20 cords/acre "will still be 20% higher than the industrial average of 16.5 cords."

However, the MFS did not provide then, and has not provided since, any scientific justification for its proposed decrease in standing timber on Maine's public forest lands. A BPL policy paper addressing inventory, or "stocking" levels, notes that "the full-stocking volume range runs from about 15 to 30 cords per acre for stands where tree size is near the current average for BPL lands."<sup>38</sup> At a current stocking level of 23 cords/acre, the public forests managed by BPL are currently right in the middle of the desirable stocking range. The average industrial timber lands, in contrast, are barely above minimum desirable stocking levels.<sup>39</sup>

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<sup>34</sup> April 17, 2013 BPL Draft of Response to Governor's Office, p. 2 [Reference 6]

<sup>35</sup> MFS Oct. 22, 2012 Memo, p. 2. [Reference 2]

<sup>36</sup> Patrick C. Woodcock email to Will Harris, undated; date of document is April 23, 2013 per Oct. 16, 2013 email from Will Harris to NRCM. [Reference 14]

<sup>37</sup> Id.

<sup>38</sup> BPL, *Forest Stocking – What is the "Right" Volume to Carry?* [Reference 15]

<sup>39</sup> BPL, Data Stratified by Forest Ownership. [Reference 1]



The MFS also suggests that BPL should increase logging on public lands to decrease the amount of standing timber because of concern about “increased mortality” from insects and disease. However, credible, independent foresters disagree. For example, Bob Seymour, Professor of Silviculture at the University of Maine and a member of BPL’s Silvicultural Advisory Committee, was briefed on the increased harvesting plan in late August 2013. According to notes by two different BPL staff who were present at the meeting, Seymour said that there is no scientific basis for the Administration’s contention that 23 cords/acre is too much standing wood. Seymour stated that potential peak stocking is 40 – 50 cords/acre.<sup>40 41</sup> Responding to the Maine Forest Service’s stated concern about tree mortality, Seymour noted that mortality on public lands is not a bad thing because the overall growth, after taking mortality into account, on public lands is still higher than the growth on any other landowner’s lands. According to the notes, Seymour went on to say that “this increase [in harvesting levels] is based on shaky grounds.”<sup>42</sup>

In addition, John Gunn, a forester and Executive Director of SIG-NAL, an independent research organization, who is familiar with BPL’s lands, believes that it is a significant indicator of good forest management that BPL successfully increased the amount of standing timber on its lands from 21 cords/acre in 1999 to 23 cords/acre in 2012. Gunn said in an email: “A bit surprising to see that a 2 cord/acre increase of stocking over a 12 year period is a cause for concern about additional mortality. Given the geographically diverse landbase, I don't know how you can make a management decision like this. ...Certainly seems like a decision from above to generate revenue then trying to justify it after the fact.”<sup>43</sup>

## **Proposed Increase in Logging Would Damage Value of Maine’s Public Forests**

The state’s existing policy to grow bigger, older trees on public lands provides positive economic, ecological, and recreational benefits for Maine people and wildlife. As noted in a research paper about the value of forests with larger, older trees, “[l]arge trees, both living and dead, have been identified as the most important substrates for threatened species in temperate and boreal forests.”<sup>44</sup>

The amount of mature forest (with big, old trees, including “late successional” and “old growth” forests) in Maine is in very short supply. Maine Forest Service Biometrician, Ken Laustsen, estimated in 2003 that only about 6% of Maine was in late successional or old growth condition.<sup>45</sup> In the last five years, based on Forest Inventory Analysis data, 20% of the forest older than 100 years in New England/New York has been harvested.<sup>46</sup> Most private commercial timber lands in the state have been harvested multiple times in the last two centuries, leaving few areas that anyone would consider fully

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<sup>40</sup> Notes of Silvicultural Advisory Committee Evening Discussion of Harvest Levels, p. 1 – 2, August 17, 2013. [Reference 16]

<sup>41</sup> Notes of Silvicultural Advisory Committee Evening Discussion of Harvest Levels, p. 1, undated. [Reference 17]

<sup>42</sup> Id., p. 2.

<sup>43</sup> John Gunn email to NRCM, October 3, 2013. [Reference 18]

<sup>44</sup> Nilsson et al, *Densities of Large Living and Dead Trees in Old-Growth Temperate and Boreal Forests*, Forest Ecology and Management 161, 2002.

<sup>45</sup> Ken Laustsen, Maine Forest Service Biometrician, reported in the National Commission on Science for Sustainable Forestry, August 15, 2005, *NCSSF Research Project C10 , Northeastern Region, Late-successional/Old-growth (LSOG) Dialogue*, April 27-28, 2005

<sup>46</sup> John Gunn, Personal Communication, Oct. 2, 2013

mature forests, and almost no areas that would be considered old growth. Most private commercial forest landowners in northern Maine are currently managing their lands on shorter rotations and logging more frequently. This type of forest management simply does not allow mature forests to grow. As a result, the remaining mature forest located on Maine's public lands is especially important — and these are the lands that this Administration would like to cut at a much higher rate.

Mature forests with big, old trees have significant positive economic value, since they are more valuable as saw logs and veneer, than as pulp for paper-making or biomass. Larger trees can also be used for a wider variety of potential products, allowing land managers to direct the trees into which ever market is paying the best price at the time of harvest. Options for smaller trees are much more limited.

Mature, well stocked forests also have very important ecological and wildlife benefits. Many of Maine's wildlife species, including pine marten, the Black-backed Woodpecker and many species of song birds, need old, fully stocked forests for part or all of their habitat requirements. The natural mortality that occurs in older, fully stocked stands also provides valuable habitat opportunities for species that need holes, cavities, and downed wood.

In fact, the need to increase the proportion of mature forest within Maine's northern forest landscape has been identified as a major need within bird conservation plans developed for the region by coalitions of state, federal, and non-governmental scientists. Recent surveys have found that the populations of a number of species that prefer older forests, such as the Black-backed Woodpecker, the Bay-breasted Warbler, and the Blackburnian Warbler, declined between 65% and 87% between 1966 and 2012.<sup>47</sup> Other examples of breeding birds in Maine that prefer landscapes dominated by blocks of mature forest includes the Bay-breasted Warbler, Cape May Warbler, Black-throated Green Warbler, Yellow-bellied Flycatcher, Golden-crowned Kinglet, Brown Creeper, White-winged Crossbill, Evening Grosbeak and many others.

Old forests with big trees also provide important recreational benefits through "deep woods" experiences not available on forest with younger, smaller trees—which comprise the majority of forest lands in northern Maine.

## Summary

Documents obtained by NRCM from the LePage Administration show that the Administration privately decided to significantly increase harvesting on Maine's public forests, thereby abandoning a decades-long policy to grow bigger, older trees in Maine's public forests. No notice of this major change in policy was provided to the public or the Legislature, and no opportunity for public comment was provided at the time of the policy change, or since. Increased harvesting on our public lands as planned would harm the economic, ecological, and recreational value of our public forests, and could jeopardize the State's certification through the Forest Stewardship Council—which has been a public recognition that Maine's public forests are being well managed.

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<sup>47</sup> Sauer, J. R., J. E. Hines, J. E. Fallon, K. L. Pardieck, D. J. Ziolkowski, Jr., and W. A. Link. 2014. The North American Breeding Bird Survey, Results and Analysis 1966 - 2012. Version 02.19.2014 USGS Patuxent Wildlife Research Center, Laurel, MD.

## Recommendations

1. The proposed increase in harvesting levels should be rescinded. Instead, the Bureau of Parks and Lands should harvest timber on public lands at a rate no greater than the Sustainable Harvest Level (141,500 cords/year)<sup>48</sup> until a future forest inventory provides information supporting a different, science-based Sustainable Harvest Level.
2. The Bureau of Parks and Lands should manage Maine's public forest lands in a way that is consistent with the Bureau's Integrated Resources Policy, unless or until the Integrated Resources Policy has been revised following meaningful opportunities for public comment.
3. The Bureau of Parks and Lands should provide meaningful opportunities for public comment prior to changes in management or policy for all cases when the Bureau can reasonably assume that there is a significant interest in the proposed change by members of the public.

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## Timeline

- Oct. 22, 2012 – Maine Forest Service proposes a 61% increase in logging on Public Lands. Memo is sent to the Governor's Office, but not BPL. [Reference 2]
- Between Oct. 22, 2012 and April 15, 2013 - The Maine Forest Service revises its proposal to the Governor's Office to increase logging on Public Lands. [Reference 19]
- April 2013 – BPL first advised of MFS Proposal to increase logging on Public Lands.
- April 11, 2013 – Governor's Office sends BPL and MFS extensive questions about logging on Public Lands and about revenue generated from timber harvesting; requests response by April 17, 2013. [Reference 5]
- April 15, 2013 – BPL prepares a draft response, assuming existing Sustainable Harvest Level limitations and maintenance of existing stocking levels. [Reference 6]
- April 16, 2013 – BPL and MFS negotiate an agreement to increase logging levels to 180,000 cords/year and decrease stocking levels.
- April 17, 2013 – BPL prepares revised draft response incorporating the April 16, 2013 agreement.
- April 17, 2013 – MFS edits BPL's revised draft response. [Reference 7]
- April 17, 2013 – BPL incorporates MFS comments and further edits agreement.
- April 17, 2013 – MFS and BPL send joint letter with final agreement to Governor's Office. [Reference 10]
- April 23, 2013 – Governor's Energy Office requests BPL's comments on bill to "modify how the revenue from timber harvest of state lands would be utilized...the intent is to utilize funding beyond that base level [for BPL operations] for addressing heating costs through a conversion to biomass heat....the state would divert that funding to this new initiative." [Reference 14]
- April 30, 2013 – LD 1468 introduced in Maine Legislature to divert funding from the sale of timber from Public Lands toward a rebate program to stimulate the use and sales of wood pellet furnaces.

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<sup>48</sup> This level was determined after the most recent (2012) forest inventory.

## References

1. Bureau of Parks and Lands, *Data Stratified by Forest Ownership, from Maine Forest Service 2006 midcycle report and 2011 data*, undated
2. Maine Forest Service Memo, October 22, 2012
3. Bureau of Parks and Lands, *Sustainable Harvest Levels, 2012 modeling*, "The version given to the auditors in Nov. 2012"
4. Bureau of Parks and Lands Memo, *"Ramping up to the increased Harvest Level of 180,000 cords per year,"* undated
5. Carlisle McLean email to Will Harris and Doug Denico, April 22, 2013
6. Bureau of Parks and Lands, Draft of Response to Governor's Office, April 15, 2013
7. Maine Forest Service, edited version of BPL's Revised Draft Response to Governor's Office, April 15, 2013
8. Emails between Will Harris [BPL] and Doug Denico [MFS], April 17, 2013
9. Maine Forest Service, *Areas of Compromise/Conflict Between BPL and MFS Reports*, undated
10. Letter to Carlisle McLean from Doug Denico and Will Harris with attached final agreement, April 17, 2013
11. Bureau of Parks and Lands, *Potential Policy Implications of Major Increase in Harvest to Decrease Inventory*, undated
12. Bureau of Parks and Lands, *Increased Harvests-Raising SHL to 150,000 cords, Effects on Silviculture and Other Things*, undated
13. Forest Stewardship Council Surveillance audit no. 2, Jan. 24, 2014 (including two Forest Stewardship Council "Indicators" of concern)
14. Patrick C. Woodcock email to Will Harris, April 23, 2013
15. Bureau of Parks and Lands, *Forest Stocking – What is the "Right" Volume to Carry?*, undated
16. Notes of Silvicultural Advisory Committee Evening Discussion of Harvest Levels, Aug. 17, 2013
17. Notes of Silvicultural Advisory Committee Evening Discussion of Harvest Levels, undated
18. John Gunn email to NRCM, Oct. 3, 2013
19. Maine Forest Service, Summary: MFS Support for BPL Harvesting Activities, undated