Thank you for the opportunity to comment on the report of the Climate Forestry Committee. We are submitting these comments on behalf of RESTORE: The North Woods, a Massachusetts-based nonprofit organization and Standing Trees, a New England-wide nonprofit organization.

We consider the report to be a very positive step toward addressing the future of Massachusetts forests. Specifically, we endorse the following actions, which were supported by some, or all of the Committee members. Until these actions are implemented through the revision of Forest Resource Management Plans, and/or codified in administrative rules, we recommend that the moratorium on logging of state lands be kept in place.

**Forest Management for Habitat**

- The Committee suggested “reducing cutting of maturing forests to create early successional habitats,” (p. 29) “increasing the goal for late successional and old-growth habitat” (p. 28), and designating recently cut or otherwise disturbed areas as early successional habitat (p. 29).

- We recommend a halt to all cutting of maturing forests for the creation of early-successional habitats, which are more common than in the pre-settlement Massachusetts forest, and the prioritization of keeping forests intact to allow them to become future old-growth, which is now greatly underrepresented compared with their pre-settlement extent.

**Ecological Disturbance**

- The Committee “found no ecological rationale for salvage harvesting” and “was deeply skeptical of pre-salvage harvesting (removal before trees are affected by a pest or pathogen) and the notion that it is ecologically beneficial” (p. 30).
• We recommend that salvage logging be prohibited on state lands except to protect public health and safety.

Carbon Stocks and Sequestration

• We note that the Committee “strongly agreed that carbon storage is typically greatest in old forests and disproportionally in the largest trees, and that Massachusetts forests can continue to accumulate additional carbon for many decades if undisturbed, thus underscoring the importance of forest reserves for protection of carbon storage” (p. 31).

• We could not agree more and believe that this is one of the most compelling reasons for greatly expanding reserves.

Resilience

• Some Committee members argued that logging or other intensive management can “increase forest resilience.” Other Committee members contend that, “the long history of forest change and recovery from historic changes in climate and natural and human disturbances indicate that little or nothing needs to be done to make forests more resilient” (p. 35).

• We find that there is no credible science supporting the claim that logging or other intensive management increases forest resilience and believe that this rationale should not be used to justify forest management activities.

Public Water Supply Management

• The report notes that the “Division [of Water Supply Protection] “acknowledged to the Committee that active forest management is not necessary to maintain an abundant and clean water supply” (p. 42).

• There is little or no credible science supporting the logging of Massachusetts state-owned watershed lands for water quality and relevant laws do not require it. It causes significant forest fragmentation and spreads invasive species. Moreover, this practice is highly controversial and the subject of significant public opposition. We recommend that all logging on state watershed lands be strictly prohibited.

Wood Production

• Some Committee members strongly “[viewed] the moral imperative to address the climate emergency as superseding consideration of additional local harvest of timber” (p. 42). The entire Committee supported “first and foremost, societal reduction of resource consumption through efficiency” (p. 43)/

• We strongly agree with these conclusions and oppose proposals to continue logging on state forest lands to maintain or increase wood production. We also strongly
support efforts to reduce wood demand and increase the recycling and reuse of wood, paper, and other forest products. We believe that Massachusetts wood production should come from private lands, which encompass the vast majority of the Commonwealth’s forest acreage.

**Forest Conservation and Forest Reserves**

- The Committee recommended “increas[ing] the Commonwealth’s 2050 land conservation goal from 40% to 50% of Massachusetts” (p. 47), “expand[ing] the number and size of reserves” to “10% of Massachusetts forests” (with some members calling for “as much as 30% of forests” (p. 48), and “codify[ing] reserves on state land to provide a higher level of protection than the administrative designation that currently applies” (p. 48).

- We heartily agree with these recommendations. Toward that end, we urge Legislators and the Healey administration to support the bills H.4150, “An act relative to forest protection,” and H.904, “An Act relative to increased protection of wildlife management areas,” which would expand reserves to about 8% of the Massachusetts land base and codify reserves to ensure that they are permanently protected.

In summary, we believe that the Committee report provides a positive foundation for expanding and strengthening the protection of Massachusetts forests. We urge the Healey administration to embrace legislation to put the provisions discussed above into statute.

Again thank you for the opportunity to comment on this important report.

Sincerely,

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