

Forests as Climate Solutions written comments

Sep 15, 2023

Dear members of the Forests as Climate Solutions Committee,

I appreciate that EEA is focusing on the role of forests as integral in addressing our climate and biodiversity crises. You have clearly expressed your understanding of the importance of expanding reserves with minimal to no human interference, as critical in meeting climate goals. In this, we are all in agreement.

I am writing to request that you consider the following:

1. Designate *all* of our public lands as reserves without human intervention.
2. Consider alternative approaches to public engagement that represent more authentic democratic processes.

Protecting Public Lands

After having attended the public comment session on September 12, I was struck by how ALL participants appeared to share common goals to mitigate climate change through carbon sequestration and storage and promote biodiversity. I believe in the sincerity of all of the speakers who took the time to show up and offer their views, and this gives me hope.

The main divergence appears to be in how we achieve these objectives. If you are of the mindset that humans can “fix” nature, including repairing our own past mistakes, then forest management makes sense. Those of us who believe that nature has managed disturbances for millions of years, and can do a better job than humans, even in the face of climate change, believe that it is best to let nature continue to prevail.

The science behind logging for forest health is questionable at best, and there is increasing evidence that minimal to no human intervention maximizes forest health and ecosystem benefits.¹⁻⁵ The greatest threats to forests today are not “*warming temperatures, changing precipitation, increasing pest occurrence, and more frequent and intense storms*,” but large scale logging using heavy equipment. By putting all public land into permanent reserves, we have the opportunity to preserve large tracts of land and contiguous corridors *immediately* to maximize carbon sequestration and storage and biodiversity.

Some speakers also pointed to ensuring that we maximize human benefits from our natural lands as well, which of course, necessitates human-caused disruptions in forest

integrity. The notion that we need “young, successional habitat” originates from optimizing both economic objectives⁶ as well as for sport.⁷ While this extractive view of forests does have merit for humans, it should be limited to private lands where private individuals or groups can make decisions to meet their interests and needs. Managing public lands where extraction is at least part of the goal dismisses the needs and desires of a substantial portion, perhaps even the majority, of the public’s will that forests should be allowed to mature and grow old. I believe that we can assist private landowners with a range of options, including incentives for both management and non-management of forested land in order to meet the CECP 2050 Natural and Working Lands goals, while leaving public lands to rewild and grow old.

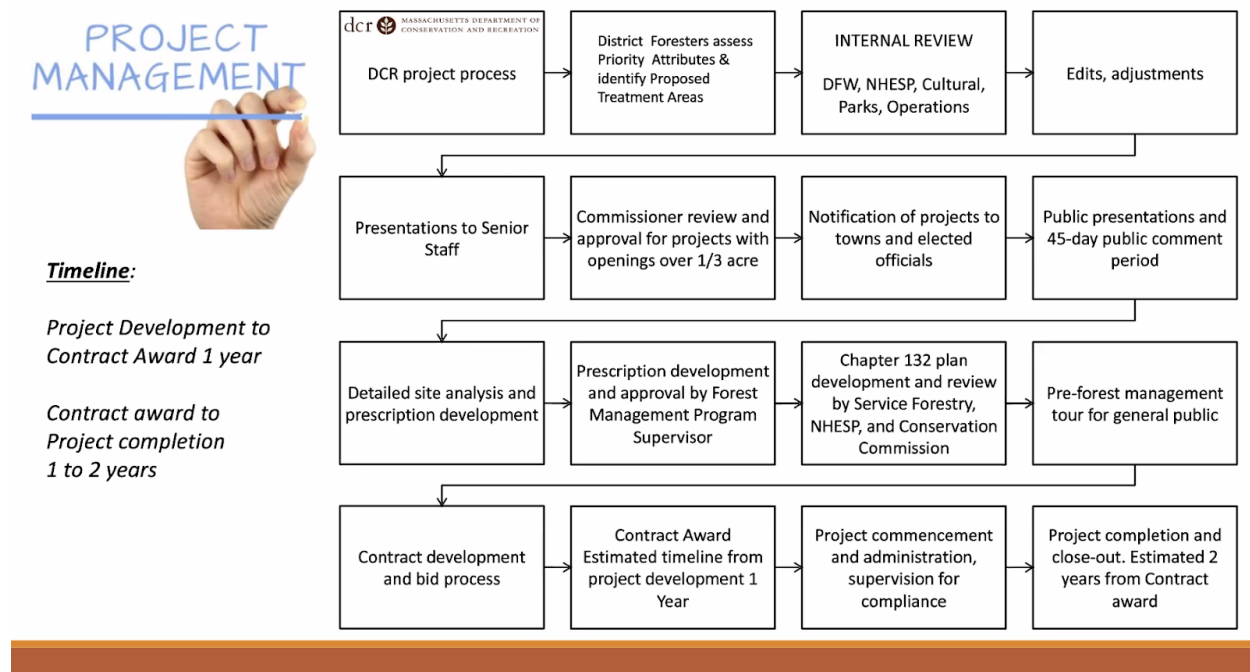
In addition, the use of an economic model for harvesting wood products sustainably is worthwhile from a production perspective, but should not be conflated with actually using forests as a primary tool to address the climate and biodiversity crises. These are two separate issues. While we may believe we need to harvest for forest products for ourselves, it is disingenuous to pretend that logging itself is in any way somehow *good* for climate and biodiversity. Yet this model is incorporated into every endeavor similar to the current “Forests as Climate Solutions” by EEA, DCR or DFW.

Public Engagement and Transparency

While I appreciate public officials meeting with small groups of citizens and sponsoring public comment periods, there is still a problem with ensuring that this is a meaningful process. This is because such interactions are generally done *after* major decisions have been made. The public is informed of a plan and is then allowed to make comments. There is no discussion, no back and forth, no opportunities for negotiation and no indication of how public comments are integrated in a substantive way into any policy decisions. In what I have observed, people are politely thanked for offering comments and public comments are posted, but decisions that have already been made are then carried out.

Let me give you an example. This model of public engagement is illustrated in the chart below which was presented at one of the DCR Landscape Designations public comment sessions. If you follow the arrows, you will see that the decision diagram proceeds throughout in a linear manner regardless of public input. Should this not be more like a decision tree with feedback loops, rather than a straight line to the end goal? For example, after a public meeting is held, could there be a box that says something like “evaluate comments and scientific input,” with maybe different strategy options following it, i.e., “if this, then that”? In other words, is there any way that public input might influence the site analysis and prescription development in the example below?

i.e., perhaps to rethink whether the project is truly necessary? Then where would the next arrow go?



Of course, this is just an example. An example from the Forests as Climate Solutions initiative, is that it seems to be predetermined that Massachusetts will increase its durable wood production by 5%. Can this be done while simultaneously protecting all public lands? How could decision makers and the public have an actual conversation about this and find common ground? Can we do both?

On a related note, I am concerned about the process of appointing the FCS Advisory Committee and the secret nature of its meetings. The composition of the Advisory Team is heavily weighted on the side of those who favor robust active forest management over those who support a more hands-off approach. While there are several scientists on the panel who promote protection of wildlands, they are greatly outnumbered by those who have many reasons to continue logging, including on public land. I can assure you, that this bias is currently greatly eroding the public's trust in the outcome.

Additionally, we have been told that the meetings of this group are "private," will not be recorded and therefore will not be available to the public. Why not? I can understand not wanting the public to weigh in on everything during the meetings, as nothing would get done. But why not let the public hear the discussions, either live-streamed or after the fact? Open meeting laws exist for all public bodies so that the public can at least see, if not participate in, government actions that affect our lives. Yet, for some reason, regulatory agencies are exempt. So even though you are not compelled to make these

meetings available to the public, it would go a long way in improving communication and increasing trust.

Thank you for your consideration and I hope that somehow these comments are meaningful.

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