January 24, 2024

Stephanie Cooper, Undersecretary for the Environment

Executive Office of Energy and Environmental Affairs (EEA)

100 Cambridge Street, Suite 1020   
Boston, MA 02114

VIA Email:  [guidelines@mass.gov](mailto:guidelines@mass.gov)

Re: **Comments on Report of the Climate Forestry Committee**

Dear Undersecretary Cooper and EEA staff:

The Department of Conservation and Recreation Stewardship Council supports the ambitious goals of the Forests as Climate Solutions Initiative and appreciates the work of the Climate Forest Committee to develop recommendations for climate-oriented forest management guidelines, based on the latest science, with the goals of increasing forest carbon storage and resilience to climate change. DCR is the largest owner of forest in the Commonwealth and bears the responsibility to steward the ecosystem and public benefits including climate that forests provide. Forest management is central to the mission of the agency. With that in mind, the Stewardship Council offers the following comments on the *Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines*.

We agree with the committee's statement that "[a]s shown in joint studies of The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) and the Intergovernmental Panel on Climate Change (IPCC), the three crises of climate change, biodiversity loss, and declining human equity and well-being need to be addressed simultaneously to avoid unanticipated and inadvertent consequences." As the largest forestland owner in the Commonwealth, DCR has a responsibility to focus on addressing these crises. In that context, we agree with the recommendation that DCR review its mission for consistency with Forests as Climate Solutions and other current policy issues, challenges, and opportunities, and ensure that agency goals and responsibilities include stewarding forests and other ecosystems, protecting and restoring biodiversity of all kinds, and assuring environmental equity and justice.

DCR's Division of State Parks and Recreation manages forests to support a range of ecosystem services including climate change mitigation, promotion of human health through improved air and water quality, forest health mitigation, conservation of biological diversity, quality forest recreation, and provision of local wood products. DCR’s Division of Water Supply Protection protects forests and drinking water resources in perpetuity for future generations. Given these central elements of the agency's mission, we appreciate the committee's acknowledgement that "to achieve the statutory missions of the agencies, including protection of forests and wildlife, provision of quality recreation, production of local wood and provision of clean water and wildlife habitat, while also meeting statutory obligations to reduce carbon emissions, will require flexibility in application of the guidelines."

The Council understands “that the recommendations are intentionally general, to be considered and applied by state land managers as they utilize professional expertise to address specific circumstances” and that “Committee suggestions are not meant to be prescriptive, instead they are intended to allow managers to apply their knowledge and enable ongoing learning and adaptation.”

While we agree with the recommendation that "agencies be more explicit and transparent regarding land management objectives [and] articulate habitat/land cover and other goals in their guiding plans, to acknowledge when those goals are taking precedence, to explain their choices to pursue specific forest management projects, and to articulate the rationale behind forestry prescriptions for individual projects within the context of their division’s mission," we call attention to existing processes. DCR’s previous efforts in this area include Resource Management Plans, Forest Stewardship Plans, the work of the DWSP Scientific and Technical Advisory Committee, the Landscape Designations process, and the Forest Reserves Scientific Advisory Committee. We encourage refinement of these existing documents and processes rather than layering of additional processes to achieve these objectives.

Regarding Forest Management for Habitat and the committee's suggestion that "consideration be given to new goals that place less emphasis on early successional habitat," we would like to call attention to the Massachusetts Endangered Species Act, which reads, in part (MGL CH 131A Section 4), “All agencies, departments, boards, commissions and authorities shall utilize their authorities in furtherance of the purposes of this chapter and shall review, evaluate and determine the impact on endangered, threatened and special concern species of all works, projects or activities conducted by them and shall use all practicable means and measures to avoid or minimize damage to such species" and 321 CMR 10.05 which states, "Unless specifically required otherwise by statute, localities on state owned lands that provide habitat for state listed species shall be managed for the benefit of such listed species. Said agencies shall give management priority to the protection, conservation, and restoration of Endangered, Threatened, and Special Concern species occurring on state owned lands." (MESA should be listed in Appendix D with other Relevant Statutory Citations.)

Many state-listed species require early successional habitat. In fact, many of these species are in need of listing due to loss of this essential habitat. As less than 1% of DCR's forested land is actively managed each year (Table 1 in the report), we believe that carefully planned maintenance and creation of early successional habitat can be balanced with carbon storage goals. We urge that guidelines acknowledge the need to maintain the appropriate landscape-scale diversity of forested natural communities – including of varying species diversity, tree density, canopy structure, and age classes – to support biodiversity, especially our listed species.

We agree with the recommendation that agencies develop metrics to evaluate their holdings for vulnerability to the effects of climate change, use these evaluations in the selection of sites and approaches for management, and assess the effectiveness of these approaches in addressing vulnerabilities.

We appreciated the committee's attention to the issue of excess deer browse and invasive species compromising forest regeneration. We urge attention and investment in efforts to comprehensively assess and strategically address these two stresses on our forests. However, we noted that there were very few mentions of fire in the entire document. Increased risk of wildfire is a great concern, exacerbated by climate change, that also requires a strategic assessment and response.

We strongly agree with the committee's support for efforts to reduce the rate of forest conversion to other uses, increase permanent conservation of forested land, and to enlarge forest reserves.

We also support recommendations for greater data collection to measure progress towards goals and to monitor the effectiveness of planned forest management activities. The frequent lack of consensus among committee members on specific management actions points to the need to expand research capacity among the agencies to guide management decisions. DCR’s recent investment in a director of research will support a centralized research effort.

While the committee’s scope may not have extended to urban and community forests, support for these forests is a key recommendation of the Climate Smart Practices List in Appendix A of the report – “Plant trees in urban and residential areas to add carbon stock as trees grow, and provide many local benefits to air quality, stormwater management, and human health and well-being.” We strongly support efforts and investments to increase the extent and resilience of urban and community forests to sequester carbon and benefit all communities, particularly Environmental Justice and underinvested communities.

Carrying out this highly impactful increase in the pace of land conservation, forest management, data collection, research, and reporting will require increased agency capacity. We strongly encourage strategic increased investment in staffing, training, technology, and peer exchange to enable DCR and other state agencies to deliver on these ambitious and critically important goals.

Finally, we recognize the professionalism, expertise, and care with which DCR and MassWildlife staff manage our common wealth of forests to benefit the people and environment of Massachusetts.

Sincerely,