First and Last Nar	Affiliation	Job Title and Organization	Keep Fores	Forest Mar	Disturbanc	Carbon Sto	Soils	Soils a Resilience	Resilience[	Invasive In	Invasive Pl	Wood Proc	Comments Pertaining To Statements Above	General Written Comments
Chris Liazos	NGO/Communit	Master's Student in Conservation Biology												Managing Massachusetts's Forested landscape towards resiliency against Climate Change and other stressors requires all forest management tools. Since the regeneration of our forests after farm abandonment 1850-1900, most of our forests are roughly the same age 90-120 years old. Any homogenized system such as our forests or human immune systems are susceptible to disturbances such as Climate Change and lead to unsurmountable harm. Our goal in Massachusetts should be to restore the unique age-class distribution of our forests managing for both early- and-late successional forests. To complete such objectives, we need active management. Wildlands and other passive management approaches allow natural succession to occur and mimic historic processes. However such approaches see results in the long-term and do not consider immediate threats of extreme weather events of climate change in the next 100 years. Massachusetts foresters are well-equipped and informed to apply active management through silviculture prescriptions to manage for early-succession (clear cuts) and late-successional (irregular shelterwood) forests. In addition, early-successional areas can speed-track the establishment of greater climate-adapted forest communities and species. These practices have demonstrated success in experimental and real-life settings. In addition, such silviculture prescriptions work well along with passive approaches. As land manager's Massachusetts should not place restrictions against management options. Taking silviculture away from foresters is comparable to taking medicine away from pharmacists or surgical tools from doctors. Foresters are prepared to perform the best care for their forests even with public opposition and require the use of needed silviculture with Massachusett's agency public support. My biggest fear is that our Massachusett's forests persist under a restricted wildlands approach. One weather event or disease wipes out forest by forest to the point we are deforested like in 1900. I'm currently studying how to manage our forests with all our silvicultural tools to see Massachusetts's forested landscape persist despite climate stressors and benefit from its natural resources. To achieve this vision, we need to diversify the age structure of our homogenized forests to young and old and manage with no-placed restrictions on silviculture prescriptions with the support of our state officials. We are falling behind compared to other state programs; we need to break away from preservationist values toward greater diverse perspectives of the growing norms of forestry in the Northeast.
charla kroll	Individual	forest owner of a stewardship forest with a bird overlay.												I would like to make a few comments if someone wants to follow up. when I go see the local forests near me in douglas / sutton I see food desserts for wildlife, invasive insect species running rampant, no volume of organics in the soil, and definitely poor diversity. such simple solutions that folks seem to be fighting against each other as an example chestnuts purest vs planting what will survive without tinkering with the plant gene. my forest is cool in the summer and warmer in the winter as it should be with its blanket of bio matter.
David King	Individual													I support active forest management on public lands in Massachusetts as deemed necessary by the trained and certified professionals from our land management agencies. Current forests are lacking age-class and species diversity. Management increases age-class diversity, which ensures future trees to occupy stands in case of disturbance, and species diversity, which makes stands more resilient to future disease, pests and climate chance. I am concerned that forest management policy could be dictated by untrained and unqualified individuals who in many cases oppose any forest management. Please resist these efforts. On my property, we lost 40 acres of hemlock to adelgid. Had we managed this stand years earlier, the stand would be stocked with trees. As it is, we need to start from square one.
Richard Keleher	Individual													Please establish policy that preserves existing old-growth forests (without active management) to the greatest extent possible.
Richard Keleher	Individual													Suggestions: Actually measure the loss in habitat/carbon-sink and the greenhouse gases. The calculations the state does, don't actually include the loss in its metrics. Revise the definition of "forest" to include smaller parcels. Use carbon sink measurements that include the ENTIRE greenhouse cost of destroying the land when logging is done.

Michael Akresh	Individual	Core Faculty, Antioch University New England	Throughout the northeast, young, managed forest are in decline as well as the wildlife that need managed, open-canopy, harvested forests, including many state-listed species of conservation concern, such as birds like the eastern whip-poor-will, butterflies and moths, and rare plants. Many game birds and deer also need managed forests and a variety of young and older forests. Most forests are not harvested, less than 5% of Mass. lands are in a young forest state, and there are already many 'forest reserves' throughout the state., thus we need more managed forest lands, not fewer in the state, to maintain biodiversity. Managed forests are also needed to control insect outbreaks, provide healthy forest stands for watersheds and reservoirs, and mitigate potential future climatic impacts such as wildfires. Public and private landowners need to be able to manage their forests with tree harvests, and I oppose any incentives for no-management scenarios, as this will have adverse effects on environmental and wildlife conservation. Lastly, although I cannot speak for Indigenous Tribes in Massachusetts, I am aware that Indigenous Tribes have historically and currently (e.g., on Cape Cod) help conduct forest management through burning and fire. I highly recommend that the committee consider Traditional Ecological Knowledge and Indigenous cultures of forest management in their formation of Guidelines.
Leo Roy	Individual		State law actually sets forth the Commonwealth's policy on forest management pursuant to M.G.L. Chapter 132, Section 40 : "It is hereby declared that the public welfare requires the rehabilitation, maintenance, and protection of forest lands for the purpose of conserving water, preventing floods and soil erosion, improving the conditions for wildlife and recreation, protecting and improving air and water quality, and providing a continuing and increasing supply of forest products for public consumption, farm use, and for the woodusing industries of the commonwealth. Therefore, it is hereby declared to be the policy of the commonwealth that all lands devoted to forest growth shall be kept in such condition as shall not jeopardize the public interests, and that the policy of the commonwealth shall further be one of cooperation with the landowners and other agencies interested in forestry practices for the proper and profitable management of all forest lands in the interest of the owner, the public and the users of forest products." In the absence of a change to state law, it appears that we support active management of our forests for a variety of benefits and services, not primarily carbon sequestration.
Russell Richardsoı	Business	Consulting Forester/Owner Appalachian Investments	The title of the effort (Conservation and Management of forestland) dooms the entire process to failure and endless debate. The effort should be to Perpetuate and manage the forests of Massachusetts. Conservation is a passive word that most people think of as "leave alone" and not is what is needed. The emphasis should be proactive and we should be trying to perpetuate the forest. Conservation is a worn out term with too many definitions to be effective at driving home the seriousness of the issues facing the woodlands of new England. I have encountered many people who are not friends of forestry scream at the uttering of the words "forest management" implying that all we are talking about is logging, preventing productive discussion from progressing any further. I sincerely suggest a word change in the title of the effort.

Laurel Facey	Government	Secretary, Wendell Agricultural Commission												My name is Laurel Facey, and I am the secretary of the Wendell Agricultural Commission. I am a proponent of solar energy and look forward to the day when trucks and tractors are no longer powered by dirty diesel and when more of our food is grown locally, reducing the need for the long-distance transportation of what we put on our tables. Electric generation is our hope for the future. I understand the urgency with which we must be transitioning to clean forms of energy production, with a great reliance on solar. However, solar installation must not come at the expense of our prime agricultural lands which we must protect in order to have any degree of self-sufficiency and productivity. The problem with solar panels over the earth which sun's rays must be able to reach in order for photosynthesis to take place is that solar panels reduce the amount of the sun's energy that is available to be used by plant crops. In some way, perhaps by subsidizing the planting – or grazing – that can occur under ground-mounted solar, this arrangement can be made "profitable," but it is still not the best use of prime ag lands. Another thing that disturbs me is the nature of the energy companies which are claiming a portion of our subsidies. They are often what one person has called "very, very big multinational energy companies that in other spheres and other things we'd be saying they're just not credible for protecting the public interest," asking, in other words, "can we trust our utility structure to foreign corporations?" What ever happened to "Made in America for Americans"? Their ability to get our state lawmakers to override town zoning bylaws is nothing short of criminal. In addition to farmland, solar is being sited on another of our valuable resources – our forests. Forests and the life in the soil must be allowed to accumulate carbon to help mitigate climate change. Global warming is occurring even as forest degradation and destruction removes forestlands as carbon sinks. The nearsighted pursuit of profit by the extractive logging industry is exacerbating the climate crisis. Solar subsidies will help level the playing field as we transition from the use of fossil fuels which release greenhouse gases such a carbon dioxide and methane, but solar should only be located on rooftops, landfills, carports, and other already developed areas and brownfields, and no subsidy should ever be awarded when lands that perform as carbon sinks. The
John Clarke	Individual	Forester	4	3	2	1	1	1	3	5	10	10	Our suite of forest species is well adapted to our climate (many are common throughout the Appalachian range south through the Carolinas). Harvesting should not be limited to climate response or habitat activities, but should be viewed as a way of encouraging desired species development and the correction of past, poor management decisions. Global climate will only be addressed and mitigated when widespread emissions are controlled.	
Don Ogden	Not listed or N/A	Co-Producer & Co-host, The Enviro Show	10	2	9	1	3	10	1	3	3	1	There exists a seeming lack of awareness of recent forest science and disregard of citizen input into updating the practices of both the MA Department of Conservation & Recreation (DCR) and the Division of Fisheries and Wildlife (MassWildlife). The practices of both agencies have, for far too long, placed business-as-usual over modern science resulting in massive logging of our Public Lands. In a time of Climate Emergency logging of our forests is counter productive. Trees, forests, understory and the soil they thrive on must be left undisturbed for the natural carbon capture and sequestration they provide freely 365 days a year, decade upon decade.	There exists a seeming lack of awareness of recent forest science and disregard of citizen input into updating the practices of both the MA Department of Conservation & Recreation (DCR) and the Division of Fisheries and Wildlife (MassWildlife). The practices of both agencies have, for far too long, placed business-as-usual over modern science resulting in massive logging of our Public Lands. In a time of Climate Emergency logging of our forests is counter productive. Trees, forests, understory and the soil they thrive on must be left undisturbed for the natural carbon capture and sequestration they provide freely 365 days a year, decade upon decade
Tim krusell	Individual	Wolf trap hill farm owner	10	8	7	2	7	1	10	10	10	10		
Craig martin	Individual	Professor. University of Massachusetts Amherst	5	8	4	4	7	7	9	10	9	8		We must do everything we can to limit climate change's impact on forests, oceans, shorelines, and cities and towns. This includes avoiding the wishful thinking that supports our normal NIMBY tendencies. A large fraction of the state is forested and to protect all of that forest, we need to convert a very small fraction (but large amount) to solar or other renewables. The NIMBY responses, while coming from the heart, are likely doing harm to the forests we all love (my home is surrounded by forests and with a reasonable buffer, would not object to a solar installation near me). It is wishful thinking to assume this can be done with parking lot and rooftop solar, or that if MA just covers our usage our forests are protected. This is a global and serious problem. Finally limiting forest solar to small footprints ignores the large fractional deforestation that must be achieved to block shade from adjacent forest trees. Another example of good hearted efforts doing unintentional harm.
Chad roy	Individual	Chad roy loves logging LLC	1	1	1	10	1	1	10	10	10	10	You should make these questions much more clear and not use language that distorts the reality that climate change is not a proven science .	As a logger I see the importance of proper forest management. A large canopy of old trees may look nice , however it is a dead forest, there is no new vegetation or wildlife present. Trees have always been an agricultural product which has seen its production as a very necessary component to jobs and society. The loss of this will be a major catastrophe on many levels. I hope the administration will take all arguments into consideration before making a decision that will effect myself and many others in the industry .

Todd Waldron	NGO/Communit	Forest Conservation Director - Northeast U.S.	9	10	10	9	8	3	9	9	9	8		Thank you for allowing Ruffed Grouse Society & American Woodcock Society (RGS) to participate in the written comments process. There are several shared outcomes of the Forests as Climate Solutions Initiative that we are enthusiastic to support, including incentivizing science-based forestry for private landowners, supporting the forest economy in Massachusetts, and linking ambitious biodiversity goals to forest resiliency and landscape diversity. Climate mitigation, adaptation, resiliency, and biodiversity are interlinked issues. There is no one size fits all approach when it comes to forests serving as climate solutions. Just as forests are critical solutions to climate issues in Massachusetts, they are also vulnerable and susceptible to climate threats. Maintaining a robust sustainability toolkit that includes both active and passive forest sustainability strategies across landscapes can help leverage beneficial synergies while reconciling tradeoffs. We need to consider both hands off approaches like setting aside reserves, and hands on approaches like active habitat management. Increasing climate mitigation means having a diverse portfolio of forest carbon stocks across ownerships and landscapes. Young forests sequester more carbon, old forests store more carbon. Managing proportions of both is part of maintaining a diverse portfolio of carbon stocks across the landscape and managing for forest resilience over time. This helps optimize synergies while minimizing tradeoffs. It is not just about climate mitigation; it is also about climate adaptation. Increasing forest age-class and structural diversity is part of increasing the adaptive capacity of our forests and their resilience in the face of climate change. Key buckets of Forests as Climate Solutions we're excited to support: • Expanding protection, management, and restoration of natural and working lands. • Incentivizing science-based forest management and climate friendly practices, and long-term carbon storage capacity of forest products. • Encouraging use of durable forest products in lieu of other higher carbon footprint products. Finally, we'd like to thank the highly professional field staff at Massachusetts Department of Conservation and Recreation,
Elena Zachary	Individual	Senior Designer, Regenerative Design Group	10	8	10	10	10	5	8	5	8	3	I think wood production in MA is sensible IF the wood is sawn and processed locally. Cutting trees here and then shipping them long distances to be milled is not helpful. If local trees are milled locally and used locally, I think that can be a relatively renewable resource. However, I don't see how that type of industry could ever go beyond niche markets of timber framing and locally sawn boards for specialty use without deforesting the landscape - given that only 5-7% of our current wood demand is met from MA forests. BUT I think it would be helpful to put an emphasis, incentive, or requirement for keeping any timber that is logged within the region for processing and sale to keep the carbon footprint as small as possible and to only feed money into local economies. Actively tending the forest and managing for certain traits like uneven aged stands and climate-resilient species composition makes sense for the immediate future, but perhaps we should plan for this to be phased out over the decades as forests move more toward an equilibrium. Because the landscape was so thoroughly logged in the past and so many forests here are roughly the same age, it is logical to continue some very specific forest management practices to help the forest recover from the damage inflicted over the past few hundred years, but the goal should be to only continue on an as-needed basis until the goals of uneven aged stands etc are met. It may be hard to define the point at which goals are met, but there should be an "exit plan" in place to eventually back off on active management. Allowing forests to reach old-growth traits should be a priority on a greater percentage of forests in the state rather than maintaining logging practices. Old-growth forests not only contain a lot of carbon but also offer other notable habitat support - for many bird species that prefer old growth for nesting, and many other benefits that are likely yet unknown given that there are so few old-growth stands in the region.	
Jane Winn	NGO/Communit	Berkshire Environmental Action Team (BEAT)	10	8	10	9	10	9	3	10	9	8	We should definitely strive to produce more wood locally, but not from state lands. This should come from privately owned, well managed lands that keeps this land from being built upon.	The percent of forest harvested per year is less important than the acreage where harvesting is ever allowed. Harvesting compacts soils and can spread invasive species. The state should limit where this takes place and include long rotation periods - but most of our state forests should not be harvested ever again. We should be shifting harvesting to private lands to the maximum extent possible to help keep those acres forested and not developed while acquiring additional lands to add to our premanently-protected-from-development forests. For urban forestry, only native, wildlife-supporting trees and shrubs should be planted - with the possible exception of fruit trees that have demonstrated they do not invade.
Dunbar Carpente	Individual		10	8	8	9	7	8	6	9	7	8		
Joseph Smith	Individual	consulting forester	10	7	10	7	8	3	9	8	8	10	Some areas should be reserved from human impact, but we have already put aside enough. There is no need to add more. To think that forests will remain healthy and provide a carbon benefit without human intervention is foolhardy. To restrict harvesting in Massachusetts is to transfer our wood demand to other places where there are fewer protections and regulations than we have here. State forests were created to maintain a wood supply. They should be managed to provide good examples for private landowners and our citizens. Forest management for water, wood, habitat, recreation, forest health and climate benefits on state lands should be increased, not decreased. The administration needs to recognize and use the expertise of the forestry professionals working for them, and not outsource these decisions to so-called experts.	

Ken Conkey	Individual	Farmer	8	10	10	1	1	1	10	10	10	10	Active forest management would be the obvious solution to our carbon sequestration goal. Why would we take all of the tools out of the tool box with a non management approach?	As a farmer (MGL CH 128 section 1A) I am very happy the governor has chosen to manage public land in a manner more carbon friendly way. We are indeed fortunate that DCR has collected data concluding managing forests sequester carbon at a much higher rate than non managed forests in Massachusetts. It is obvious beyond a doubt forest management needs to increase in Massachusetts.
Kate O'Connor	NGO/Community Group/Non-profit		10	1	10	1		10	1	1		1	#7 - Open lands should be created by natural disturbances only, ie, beavers, lightning strikes, weather, disease. etc. #9 - Young and middle-aged forests do not sequester carbon at higher rates than older forests. This is a greenwashing lie. Nature can very well take care of diversity in forest stocks far better than humans. #10 - Forest soil carbon can be best protected by leaving the forests unlogged. #12 & #13 - Natural selection can create forest conditions that will increase forest adaptive capacity to future stressors and promote resilience to ecological disturbances. Humans have proven ourselves very stupid at guessing how to manage forests. We are responsible for the horrific wildfires and so many other problems due to our mismanagement and greed. #14 - Toxic pesticides/herbicides pollute water and destroy soil organisms. They should not be used to manage invasives. Invasives invade following logging and human disturbances. Mechanical and animal (goats) removal of invasives is appropriate in some circumstances. #15 - All state forests should be allowed to grow old unmanaged and unlogged. All Massachusetts private forests should be evaluated for their climate services potential, and the forests with the oldest and largest trees providing the most climate benefits should receive permanent protection. 30 - 50% of all Massachusetts forests should be permanently protected, leaving the other 50 - 70% of private forests available for sustainable forestry and climate oriented management.	Trees create our livable climate as well as reversing climate change and lessening the impact of existing climate dangers. Trees remove greenhouse gasses from the atmosphere for free, reduce heat and particle pollution from the air, clean and store rainwater and promote normal rainfall, reduce flooding, create and preserve healthy soil, promote human health and wellbeing, provide habitat for biodiversity; and more. Forests do this best when they are left to grow old, unmanaged. Forests do not need human management, which contributes to carbon emissions, forest fires, harms soil organisms and fungal networks, damages wetlands, reduces filtration and increases soil erosion, and allows more invasive species, bugs and diseases to invade and harm forests. Our best climate solution for regulating and cooling our climate and removing atmospheric carbon is to leave forests unlogged and free of toxic chemicals.
Joseph Nowak	Government	Selectman (Adams)	6	8	3	9	9	4	8	8	10	7	After entering my numerical responses to your questions, it made my point, that we are dealing with a crisis much bigger than our shared abilities to solve in total. However, we must NOT give up. Thanks for the Healey Administration's focus and determination to attempt to curtail this pressing matter. I want to be a partner moving forward in your quest to stabilize our Forests future and the present benefits our forested lands play in slowing down climate change. Respectfully, Joseph J, Nowak; Adams	Our Forests are key to assist in climate change, but they are under duress. Large tracts of forests within the Commonwealth are being threatened by insect infestation and invasive plants. In my opinion, these detrimental attributes are so difficult to curtail and unpredictable in nature's mosaic and "oneness" in harboring synergistic healthy ecosystems. These trends and unknowns are bound to continue as climate change expires some species and introduces others. We are stewards of our environment and must be "on our toes" and not continue to be reactive to known and pressing climate issues. This will take an enormous amount of scientific research and boots in the woods to keep pace with our ever changing natural "world".
James Rassman	Government	Service Forester	10	3	10	1	1	8	3	3	10	2	Many of these statements are mixing facts and classic opinions to justify harvesting trees. They are very hard to respond to honestly. Forest don't need us except to remove risks we have introduced (invasives, poorly sited road and trails, drainage of wetlands, removal of key species etc). The old story of New Englands even aged agriculture forests needs to be updated with the return of deforestation, increasing disturbance, and the need to keep carbon on the landscape and soils. Its time for foresters to stop being defensive and meet the demands of the forest owners instead of their own predetermined goals	The only real way to effect climate at scale is to keep forests as forests (land protection and CRs). The rest are at best distractions and delays that waste funds and at worst are green washing to promote business as usual
	Commercial Association		8	10	9	4	8	1	10	10	10	10	The demand for wood products will be met whether it comes from Massachusetts or not. With the climate in mind, it would be wise to source more wood from Massachusetts state land because of the strict Best Management Practices that are enforced in the state. Wood coming from other states or countries may not have as strict of forestry guidelines and therefore may negatively impact the climate.	It is absurd that DCR must "restructure" an already proven forestry program because of the efforts and complaints from organizations and people who have no education or experience in forest management or biology. DCR needs to do a better job at educating the public and politicians of the benefits of forest management. The most recent CFI plot results show the existing management guidelines are working.
charla kroll	Individual	forester	8	7	8	8	10	3	4	3	1	5	it is all about the soil and roots treat them well and the rest will follow.	
Jodi Rodar	Individual		10	10	1	1	1	10	1	2	4	1		I am writing to express my support of S1319/H2082, An Act Regarding Municipal Zoning Powers sponsored by Representative Paul McMurtry and Senator Jacob Oliveira. This bill simply strikes language from the zoning act. Section 3 of Chapter 40A of the General Laws would be amended by striking the following language: "No zoning ordinance or bylaw shall prohibit or unreasonably regulate the installation of solar energy systems or the building of structures that facilitate the collection of solar energy, except where necessary to protect the pubic health, safety or welfare." This sentence was added to the law in 1985, when the thought of acres and acres of solar panels was unimaginable. This bill would make sure that municipalities can pass and enforce reasonable regulations for solar just as they are allowed to do for any other development. This bill does not encourage or discourage solar development. It protects citizens and municipalities who are often losing court cases while trying to uphold their zoning bylaws. The antiquated section of the law is used by solar developers to bypass local bylaws to put solar where they want to. This bill protects the longstanding tradition and value of local control in Massachusetts, and would potentially protect tens of thousands of acres of forests, wetlands and farmlands from large solar projects are deemed locally as inappropriate. Thank you.

Russ Richardson	Business	Forester/Broker Appalachian Investments	9	10	10	10	5	1	10	1	10	10	The forests of Massachusetts are significantly degraded after over 400 years of use...with at least 300 years of forest "management" guided by Manifest Destiny.	As written, the title of the project is inappropriate and untenable. The emphasis appears to be Conservation AND Management of Massachusetts forests. The word conservation is worn out and far too generic to be effective. In 1967, fifty-six years ago, when myself and other students petitioned for an "environmental science" class at my high school (Mohawk Trail Regional HS) we asked for a class in conservation, the only readily recognizable environmental term in use at the time. "Conservation".. became "ecology" in 1974 and "environmental science" in the 1980s. Can't we choose a better word? To most people "conservation" is a passive term indicating to leave something alone...do no harm. Management has become a volatile word with the public likely to sneer "logging" at the sheer mention of the words "forest management". Forest management is more than just logging. The emphasis of the effort in MA should be to PERPETUATE and MANAGE our woodland. Both words are proactive. There are too many definitions and subsets of "conservation" already...wildlife, fisheries, hunters open space and on and on. Every person has a different definition of what generic "conservation" means making the word entirely ambiguous. Conservation nearly always indicates a passive approach to a natural resource problem. Our forests need to be perpetuated. In order to perpetuate healthy forests, whether it is wilderness, private woodland or public reservations and parkland, proactive management is necessary to maintain, protect or enhance the public and environmental benefits. By dropping the word conservation and inserting the word Perpetuation of healthy forests brings in a term that everyone can agree with...we want to perpetuate our forests... Mother nature needs our help if we are going to maintain and perpetuate healthy forests in Massachusetts.
Lynne Man	NGO/Communit	Coordinating Committee for Regenerative Farms, Forests and Food Systems Group (RF3), Climate Action Now, Western MA	10	1	10	2	8	10	3	3	7	3	Q7 Assumes that human creation of early successional habitat is a proven scientific strategy for optimizing ecosystem health. Q9 - We agree with the first two sentences, but do not believe that this implies the conclusion Q10 - This depends on what the "harvesting practices" entail, i.e., use of chain saws instead of feller-bunchers, for example, would promote this goal Q12 - This depends on the driving force - should be led by natural systems, not profit-driven Q13 - This depends on criteria for "pro-active harvesting". Also, what alternatives are there to tree harvesting and pesticide use? Q14 - We agree with mechanical (not chemical) removal (creates jobs, not toxicity) Q15 - We cannot answer this question as written - We agree that we need to increase local sourcing and production. However, Massachusetts should play a role in developing alternative products without using trees. These needs can be met on private land, which is more abundant than public lands that belong to everyone. We need a statewide campaign including regulations and incentives to reduce (consumption), reuse, recycle. Re: the survey: we find many questions to be biased, i.e., many questions make assumptions and don't allow for nuanced understanding or responses. They have components that we agree with as well as those with which we disagree. Could not tell how to score. Also, is this scale bifurcated in the sense that anything above 5 is the amount to which you agree and anything below 5 is the amount to which you disagree? Or does marking a "3" indicate just a little agreement?	
Arlen Gould	Individual		10				10	8	2	10	10			
Miriam Kurland	Individual		10	1	10	4	6	10	2	2	6	2	Many of these questions are poorly written and do not allow for true input to protect our forests from the many things that are hurting them. Human intervention has been the biggest threat to our forests. Wild forests take care of themselves. Leaving our public forests as wild is increasingly important. Our state can be doing so many things better.... reducing the need for wood, recycling and repurposing wood that is used and thrown away, growing bamboo and hemp in already disturbed lands and growing production of these plants to reduce the need of wood, installing heat pumps in more homes and industries, placing solar on already disturbed lands, parking lots and rooftops and more.	We need to keep our public lands wild and free from logging.
Bruce Spencer	NGO/Community Group/Non-profit		10	5	8	5	10	3	6	5	10	10	No mention was made of the negative impacts of large heavy logging equipment on soils and their ability to store carbon, and maintain fungal connections between trees, the benefits to tree growth and health, and importance to pure water runoff. If this is not addressed than discount all my answers above.	Climate Smart Forestry or Climate Resiliency is unfortunately beyond our industrial methods of harvesting forest products.

Charlie Cary	Individual	10	10	10	7	8	2	10	10	10	10		I certainly hope Climate Oriented Forest Management includes a determination on the highest and best use of wood which is cut and not made into a carbon sequestering product. For decades public policy discussions have focused on what should and should not be cut without any discussion of how best to use the residues. Certainly, some residues should be left in the forest to enhance the soil, but millions of tons of residues are being generated annually in Massachusetts which are chipped for transportation. Someone NEEDS to think through the climate impact of these chips as carbon from these chips return to the atmosphere in the short term. The amount of these chips will certainly increase with climate change induced tree mortality. This chip production is literally ubiquitous across our society – utilities, public sector, forest products industry, residential homeowner - and the value of these chips is currently less than the cost of delivering them to market. Without new markets for this residue any climate oriented forest management will cost more because this residue is currently a waste with a negative market value. Creating carbon sequestering products out of these chips requires capital investment and centralizing a decentralized resource. In the meantime, millions of tons of carbon from these chips return to the atmosphere. Climate oriented forest management would require less subsidies and carbon from the chips would keep fossil fuel's carbon in the ground with the development of local wood heating fuel supply chains. At $3.00 a gallon fuel oil, a ton of green wood chips produces the same amount of heat as $180 worth of oil. This value is over four times the current market value of chips. It just makes sense to heat schools and hospitals with locally produced wood residue. The wood heating industry is a perfect example of "the desire for perfection being the enemy of the good". Massachusetts is burning thousands of tons of residential and industrial "waste" on a daily basis to generate electricity. If we are going to burn any "waste", shouldn't we burn our cleanest "waste" first? Particularly when it keeps carbon in the ground, subsidizes climate-oriented forest management and keeps dollars in our local communities. Life cycle accounting demands consideration of the highest and best use of wood which is cut. Developing new carbon sequestering markets for these resources will take time and offers an uncertain future. Recycling this carbon as a heating fuel can be done immediately using existing locally available infrastructure. Development of climate oriented forest management policy must include consideration of the highest and best use of wood residue.
Charles Thompsoı	Individual	9	9	7	9	2	2	9	6	8	10		The composition of the "expert panel" is flawed. Although there are a number of foresters on the panel, there is no one who makes their living on a day-to-day basis managing woodlands in Massachusetts. There is at least one member whose answer is simply to not manage the forest. There is no representative of the people who actually do the work in the woods (licensed timber harvesters). What does this glaring omission say about the real purpose of the panel? The outcome of the panel's work is likely to be a reduced menu of "acceptable" practices in forest management, which is exactly the wrong approach. If we are to learn how best to manage the forest in a "climate-friendly" way and adapt to changing and unknown future conditions, we need an expansive suite of practices that can be applied, measured, monitored and learned from. The state forest system is an excellent lab in which to experiment with various practices and approaches, and then to monitor results. An expert panel would be appropriately convened after a certain number of years to assess results. Ultimately, good forest management will be good "climate-friendly" management. And nobody has said it more succinctly than the IPCC: " In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber, or energy from the forest, will generate the largest sustained mitigation benefit."
Bill Girard	Individual	10	10	7	4	5	1	10	10	10	10	Smaller equipment does not mean less ground pressure	More forest products should be sourced from Massachusetts state land. Increased timber harvesting in a well regulated and responsibly managed forest, like Massachusetts, would benefit the climate. If not, the demand for wood products will be fulfilled elsewhere and may do more harm than good to the environment and climate because of poor forestry practices. We all live on the same Earth. DCR should utilize Massachusetts forests rather than let old growth die and release all of its stored carbon back into the atmosphere rotting on the forest floor. When trees are cut and sawn into lumber that carbon is stored for decades and even centuries. A individual without a degree or experience in forestry should have no say to how DCR manages state land. The CFI data and combined experience and education of DCRs foresters should be all that is needed to prove timber harvesting is an important component to combat climate change. Harvesting more timber from Massachusetts state land is the responsible thing to do.

John McDonald	Individual	Professor, Environmental Science Department, Westfield State University	10	8	10	8	9	2	8	10	10	10	I support the active management of state-owned forests as necessary to create a diversity of forest age classes and to produce a range of forest habitat conditions. Many species prefer or require young forest age classes for part of their life history, these age classes are ephemeral by nature and keeping them on the landscape requires active management, especially in our modern, human-dominated landscape. State-owned lands are critical to accomplishing these goals, as they are often the only lands that can be managed at a scale that produces functioning young forests and satisfies the needs of area-sensitive species. I'm not sure what the real question is in #7 above; I support creating grasslands to provide habitat for those species, many of which have endured long-term population decreases, but am not sure what you mean by the most carbon sensitive ways to accomplish this. On the Massachusetts landscape, the areas which are suitable for grassland habitat are already limited, focusing on carbon sensitivity for this type seems too limiting and would have no measurable effect on emissions.	
Jennifer Unkles	Individual		9	6	9	5	8	7	4	5	10	2		
Owen Macdonald	Individual		10	4	9	7	4	5	5	9	9	1	Keep Forests as Forests This should be the highest priority of this initiative, as development is the greatest threat to Massachusetts forests and consequently their ability to store and sequester carbon. Forest Management for Habitat Some research indicates that habitat for species require open, grassland areas are already in a good spot, and therefore should not be a high priority for this initiative, particularly as it relates to old growth areas managed by the state. Areas that are more actively managed can keep this in mind for their practices. While managing for habitat should not be neglected, it should not take precedence over the goal of conserving forests and increasing carbon sequestration and storage. Disturbances Disturbances are of great importance to forest health, but should not be allowed to get out of a hand in a way that harms people or is ultimately detrimental to the forests. A combination of natural disturbances and man-made ones should be relied on as appropriate for the health of the ecosystem. Climate change may create conditions that give increased rise to disturbances, and the ability of Massachusetts forests to cope with this is uncertain. Further research should be conducted on how forests may be affected, and how different approaches to management (active/tacet) will prepare forests for the future. For the present, a combination of these methods should be employed, but it is paramount that the initiative keep up with the latest science and change approaches as necessary. Carbon Stocks & Sequestration Further research should be conducted in this area as well, as I have seen conflicting research on the ability of older trees to sequester carbon compared to younger trees. Broadly, multiple approaches should be taken to keep things flexible, as ecosystems are dynamic and a one-size-fits-all approach is likely bound to fail, but older growth forests should be prioritized due to the relative lack of them in the state compared to younger trees. Most of the forests in the state date back to farm abandonment in the late 19th century, so they are generally relatively new. Since the hopefully increasingly sustainable harvesting of private lands will continue under this initiative and therefore	I appreciate the opportunity to comment on this initiative, as I find public engagement very important to this process. I am a student in an environmental policy class, and have been studying this policy, which has been very illuminating about forestry and the process behind environmental policy initiatives at this level. I am grateful for the opportunity to give my thoughts on this matter as it is developing. I am also a resident of Ayer and of Leominster Massachusetts when I'm not at college, and was born and raised in the state. I spent a lot of time as a Boy Scout when I was younger hiking, camping, and generally enjoying the forests, so they have a lot of significance to me. The flooding in Leominster back in September further convinced me of the criticality of this issue. Most of what I want to say is contained in the specific comments on the next page of the form, but I would like to say that while I admire the Healey administration's commitment to conservation goals and reducing greenhouse gas emissions broadly speaking, I have several concerns that I would like to address. First, I hope that no part of these efforts are seen as a sole solution to climate change within the state. Research has shown that although the restoration of forests is important to the fight against climate change, reducing emissions from sources like fossil fuels is even more important. We cannot rely on forests to sequester carbon emitted from other sources, and must fight climate change on all possible fronts. Climate change is a global emergency and must be treated as such. I don't think the administration sees this initiative as a substitute for action on other fronts, but I still think it needs to be said. Second, my time researching this policy has shown me a broad lack of scientific consensus on many key issues related to the management of forests in this plan, including resiliency of forests, among others. The administration has expressed its commitment to acting according to the best science, but when the science is unclear, efforts should be made to support further research to the greatest degree possible. I think it is the right call of the administration to remain flexible in its approach on this issue, but more decisive action can be taken with better information, and I think that is absolutely worth putting substantial resources into. Third, approaches at the legislative level should be considered in tandem with this initiative, such as house bills H.4150 and H.904. These came to my attention after the last public input meeting, and I think are worth considering for the
	Business		10	10	9	4	4	1	10	10	10	10	If concerned about soil disturbance, large machinery tends to have less ground pressure. A cut to length operation has much less impact on the soil than a whole tree operation.	Well managed, growing forests sequester more carbon and provide better wildlife habitat than locked up un-managed forests. Letting uneducated citizens make decisions about DCRs forestry program is like a doctor letting a child diagnose their patient. Google cannot substitute a professional education. Also, an old growth forest does not benefit any wildlife species known to man. Cut more timber and observe the benefits of a locally sourced renewable product while also attributing positive environmental and climate impacts.
John A.	Individual		10	10	10	5	6	1	10	10	10	10	An increase in wood from state lands is needed.	Why is DCR restructuring the forestry guidelines? This was debated when Deval Patrick was elected governor and forest management was proved to be beneficial in all aspects pertaining to the climate, environment and wildlife. Reducing timber harvesting would be a step in the wrong direction. More management is vital to combat the climate crisis.
Bruce Spencer	NGO/Community Group/Non-profit		10	5	5	8	10	3	9	8	10	8		Public lands of the Commonwealth of MA are precious assets and during this time of climate change, which is a negative force on the forest, we as stewards need forest tending practices that do not diminish the productive capacity of forest soils which is the main force in maintaining pure water and the forest ecosystem important to all life on this earth. Recent soil research has shown the importance of healthy soils with active fungi, bacteria and viruses all connected with trees and plants, but easily impacted with soil compaction, rutting, and mixing from heavy logging machines which are not limited to 10% or less of the harvested area, but often up to 30% or more. I believe forest tending is needed for much of the Commonwealth's forest so it can be a safe place for tending and recreation. Our DCR inventory tells us that forest mortality is increasing and forest growth is declining on all forest. This means dead trees everywhere, but it doesn't have to be, we can evolve with appropriate logging machines (some are already available) and keep the foot print to less than 10%, but it will take time and courage to move forward to save our green wealth.

Michael Mauri	Business	Independent consulting forester / MA Licensed Forester	10	10	5	8	10	3	8	8	8	5	8. Disturbances: Only two of three points are correct. Yes, disturbances may increase structural complexity and deadwood, but disturbances will only increase biodiversity if the natural forest response can function properly — if, for example, deer are overabundant or invasive plants take up the new growing space created by a disturbance, then there is a risk that disturbance can lead to REDUCED BIODIVERSITY. 9. Carbon Stocks & Sequestration: This statement is not entirely correct. Though managing for a diverse range of ages and developmental stages across forest landscapes is essential for many reasons, it is only fully effective if two other conditions are met: •The young forest that is created by management reflects the needed tree species diversity (and does not shift the species composition to less-appropriate species mixes). •The process (e.g., logging) by which younger age classes are created does not unduly compact or otherwise alter the soils of the forest so that the soils can function at their highest capacity. 10. Soils: Yes, protecting soil carbon is important, but it is important to add two more things: First, by protecting the soil, we not only protect current carbon storage but we protect the ability of the forest to continue to grow, thrive, and be diverse. Second, though soils in riparian filter strips and other exceptional areas are protected by current regulations, and though measures are taken to prevent erosion on slopes – primarily on roads and trails – there is no real protection from compaction and rutting for the vast majority of the upland forest soils within a given logging footprint. As a result, outcomes are highly variable, with frozen ground or light equipment or careful project design and implementation generally providing better protection of the soil across a site than logging on insufficiently stable soils with excessively heavy equipment that can result in overly compacted soil and deep ruts across the site. 11. Resilience: This statement is only true if we are willing to accept any and all outcomes for our forests. But if we hope and intend in the future to have forests of diverse tree species and large trees – such as we do now – then we will have to intervene on a number of levels to ensure that the forest can function properly. One key weak link in the resilience of our forests at this time is the tendency for a number of interfering factors to greatly limit or even totally prevent the successful establishment of a sufficiently diverse mix of young trees that would be the big trees of tomorrow. These interfering factors include excessive destruction of young trees by our high statewide population of	I thank the Committee for working on this task. I am adding two more answers as overflow from the next page: 14. Invasive Plants: Non-native invasive plants are a direct threat to our native forests. It cannot be overstated that the more than non-native invasive plants thrive, the less our native forest thrives. The presence and persistence of non-native invasive plants and their potential to undergo overwhelming and exponential growth runs counter to every conceivable objective for the forest, whether it is carbon storage or sequestration, timber growth, promoting native biodiversity, etc. This statement lacks one additional and important point: the longer that non-native invasive plants are allowed to thrive and expand unchecked in the forest, the harder it becomes to control them down the road. 15. Wood Production: The term “more wood” is confusing. Rather than “more wood”, it would be better to say that wood SHOULD CONTINUE TO BE SOURCED FROM MASSACHUSETTS FORESTS AS CONDITIONS ALLOW. There are two categories of wood sourcing. •One source of wood is from any lands which have timber or wood production as a priority. For those lands, the question of HOW MUCH wood is produced is determined by the capabilities of the land and the effectiveness of the management over time. This may end up being more wood, the same, or less wood than now. •The other source of wood is from lands which do not have timber or wood production as a top goal, but for which timber might be produced incidentally in the course of pursuing other goals. In this case, it is not appropriate to seek to produce MORE wood. Rather, one must be content to wait and see how much wood is produced in the course of pursuing the actual objectives of that owner for that site. Thank you!
Adam Moore	NGO/Communit	Adam Moore, President of Sheriff's Meadow Foundation and Chair of the New England Society of American Foresters	10	10	10	6	10	2	9	9	10	10	The statement regarding insects and disease contains two points that may conflict with each other.	I am very pleased that the Massachusetts Executive Office of Energy and Environmental Affairs is soliciting comments from the forestry community on the subject of "Forest as Climate Solutions," and I am also very pleased that the Commonwealth has formed a Climate Forestry Committee. I am pleased to offer the following general comments. 1. I concur with the opinion of the New England Society of American Foresters that the moratorium on harvesting on state lands ought to end, and encourage the Committee to consider the letter and supplementary information being submitted by NESAF. 2. I believe that forests offer a most helpful buffer against the detrimental effects of climate change, yet recognize that forests are only a small part of what must be a much larger solution. 3. When considering forests as a climate solution, the committee must recognize that the time frame for the sequestration and storage of carbon in forests - over hundreds of years - is vastly smaller than the geological time frame that humanity is acting on when burning fossil fuels that have been stored beneath the surface of the earth - for millions of years. 4. The committee ought to consider the potential for storage of carbon in solid wood products, such as lumber. 5. The committee should consider that using wood in the construction of buildings results in a smaller carbon footprint - even though trees have been felled and sawn into lumber - than the construction of buildings using steel and concrete. 6. Forest management that includes harvesting of trees is necessary to maintain certain kinds of forests, such as pitch pine forests, that are ecologically unique and important. 7. Forest management that includes the harvesting of trees may be necessary to reduce the risk of wildfire, especially in southeastern Massachusetts. 8. The Commonwealth could do more to address climate change by encouraging the conservation of more forest land.
Shane Bajnoci	Business	VP, Timberland Management / W.D. Cowls, Inc.	5	10	3	8	5	1	7	2	10	10	Base the management of our forests on science. Think global, not just local.	My observations and experiences while practicing forestry in Massachusetts for over 25 years has shown that managing forests for health and diversity absolutely adds to the ecosystem services that a forest can provide. (e.g., timber, fuel, bioproducts, carbon sequestration and storage, nutrient cycling, water and air purification, wildlife habitat, recreation, ...)

Brian Donahue	Individual		10	1	10	10	10	5	5	10	1	10	7. enough open shrubby habitat can be generated by normal silviculture associated with sustainable timber harvesting. For grassy habitat, we should look more at how we manage pastures and hayfields (we have lots of bobolinks on our farm). 11: ecological processes should be allowed to unfold on some part of our forests. They will be perfectly resilient in an ecological sense. 12: I believe a large part of our forests should be managed because we need wood products. In the process, by producing a diversity of age classes, these forests will be more "resilient" in the social sense that they will be less likely to suffer catastrophic disturbance all at once -- which would be fine ecologically, but hard for people to have to live through. I think this whole resilience argument is partly over slightly differing definitions of "resilient."	comments sent to guidelines@mass.gov
Tim Hawley	Individual		10	10	1	10	10	1	10	8	10	10	6. Preventing conversion of forest to other uses is the best way to manage forests for carbon. 8. Biodiversity, structural complexity, and dead wood will increase with time. It has been less than 150 years since much of our landscape transitioned from about 150 years of agricultural use. > Disturbance does not always increase diversity; too much of anything tends to reduce diversity and disturbances like the introduction of chestnut blight and Dutch elm disease have reduced diversity. > Not all forms of diversity are beneficial; Oriental bittersweet, buckthorn, and Japanese knotweed interfere with the growth of trees that could sequester and store carbon for many decades. > Proper harvesting can increase diversity, complexity, and dead wood. 9. Broad landscapes (thousands of acres) dominated by old, large trees are the most vulnerable (least resilient) to hurricanes, insects, and diseases, so they are not guaranteed to always be dominated by old, large trees. > I have walked through land burned in Yellowstone NP and Baxter State Park, two places where no harvesting was allowed, and that is not the way to sequester & store the most carbon. > Carbon stock management must account for as much of the carbon cycle as possible. Reserving trees on one acre will cause more trees to be harvested from another acre, such as in a tropical rainforest with limited environmental controls or, more likely, the substitution of more CO2 intensive products for wood products. A 1976 study by the National Research Council committee on Renewable Resources concluded that producing 1 Ton of steel requires 50.3 million BTU oil equivalent, compared to 2.9 million BTU oil equivalent for 1 Ton of softwood lumber. > Our CO2 problem has little to do with our forests. The concentration of CO2 in the atmosphere rose very little when large parts of the eastern U.S. were cleared for farming. Atmospheric CO2 rose when we began our profligate use of fossil fuels and it has not stopped. Per capita miles driven per year in the U.S. has nearly doubled since Earth Day in 1970, from 5,600 in 1971 to 10,900 in 2022 (Energy.gov). > Forest management for carbon can be improved, but the notion of reserves for managing carbon is misguided. Reserves are important for other reasons, including as a component of landscape diversity, some forms of recreation, wellness and spiritual renewal, and scientific research. See #15. 10 Soil carbon is also protected by preventing conversion of forest to non-forest. 11. True, our forests are resilient and do not need us. The problem is that we need the forests. Humans rely on forests for a multitude of products and ecosystem services. Interventions that allow us to live in houses instead of caves, prepare and eat food a few feet above our feet, draw safe drinking water from a faucet indoors, enjoy the	
Robert Cherdack	Individual		10	2	2	2	9	9	3	10	10	2	The meaning of wood consumption needs to be clarified. Does it include wood used as fuel? If so, how is it measured , especially at the individual user level? When it is stated that Massachusetts imports 93 to 95% of its wood how much of that imported wood is cut in Massachusetts but processed elsewhere? Is cutting for paper manufacturing included in the above figures or dealt with elsewhere? Use of wood as fuel should be phased out.	1) When calculating the carbon stored after logging you should acknowledge that it takes several years for trees to emerge from the brush that grows in cutover areas unless there is very extensive use of herbicides. 2) Calculations of carbon release should include the carbon released in the manufacturing, maintaining, and transporting of logging equipment and manpower as well as the efforts expended in managing the cut, none of which attends leaving a forest alone.
Hayden Conkey	Individual		10	10	10	7	7	1	10	10	10	10	More wood should be sourced from Massachusetts state lands than what has been produced in the past.	It is frustrating to see the state take into consideration the uneducated opinions of the general public and politicians. The importance of a well managed forest has been historically proven time and time again by individuals and organizations who have a PROFESSIONAL EDUCATION in forestry or a related field. Timber harvested in Massachusetts comes from responsibly managed forests with strict and well regulated forest management guidelines that help to combat climate change. If forest management is decreased or depleted on Massachusetts state land, the wood will end up coming from other states with little or no regulations, ultimately causing more harm than good to the environment. It would be wise of the Commonwealth to increase management of the states forests and listen to the professionals, not the public.
Christopher Ives	NGO/Communit	member of Elders Climate Action Massachusetts	10	1	10	1	10	10	5	9	10	1		Please create guidelines that maximize the protection of public forests in Massachusetts as preserves (no logging) to maximize carbon sequestration/storage and provide habitat supportive of biodiversity.
Sandy Fosgate	Individual		6	7	7	6	8	3	7	8	10	2	9. I thought that older, larger trees sequester more carbon than younger, smaller ones? Worth verifying. 10. Is it true that soil stores more carbon than biomass? Again, worth verifying. I would increase the agreement rating of both questions if I knew both were fully true. Thank you.	While I wholeheartedly support the preservation of State forests as carbon sinks in general, please allow the continuation of ecological restoration plans to preserve rare, imperiled habitats and species, such as at Myles Standish State Forest in SE MA. Let us not sacrifice progress on one ecological goal to serve another. Instead, please immediately put a moratorium on sand and gravel strip-mining, and close the agricultural loophole designed for cranberry growers that allows entities to quietly clearcut forests, remove sand and gravel even below the water table, and sell all three for short-term profit. This practice is irreparably and senselessly damaging our Commonwealth's ability to sequester carbon, provide crucial habitat, protect endangered species, and filter water entering our sole-source aquifer. We in the Southeast urgently need State oversight on this issue and sufficient penalties and enforcement to deter these pirates, who will otherwise leave taxpayers with an exorbitant burden of water treatment. Thank you for the opportunity to comment.
Kate Oconnor	Individual		10	10	10	4	5	1	10	10	10	10		I am brainwashed and uneducated

Howard Jennings	Individual	Retired	10	1	10	4	7	10	2	5	7	3	The state of the research overwhelmingly now shows that areas that are logged become net SOURCES of carbon to the air for approximately 20 years and don't regain nearly the sequestration ability of the forest they replace for many decades. We only have about 20 years, if that, before we will absolutely be beyond the point of no return on climate, so EVERY harvesting must support absolutely critical needs and be subjected to the highest scrutiny. Public lands especially must be preserved in perpetuity. The idea that mature trees will eventually die so should be harvested is meaningless. We have very few trees in MA over 100 and most species will live twice that long and more, and when they die they continue to store carbon for decades. The idea that we should kill trees to protect them from insects and disease is on shaky ground. We did our best to cut all the American chestnuts to protect them from the blight, and got most of them, but miraculously some disease resistant strains are reappearing - how many more might have survived if we hadn't cut all we could? In terms of adapting the forests to climate change, generally the oldest trees are most resistant to stressors, and how do we accomplish this proposed transition - by cutting them down and planting with new ones? To what carbon impact, as above? A long term perspective is good, but our own survival requires a last ditch, flat-out short term effort or the long term will not matter. Think of your own children and grandchildren as I think of mine. The idea of managing the forest for diverse age groups, i.e. cutting old trees to allow newer trees is heresy in this contest. Likewise early successional is heresy in cutting lifesaving older forests mostly for the benefit of game species (and I say this as a hunter myself). Though you don't mention biomass, please do not allow logging for industrial scale biomass anywhere. It is more polluting than coal at the stack and destroys the carbon sequestration and storage capacity of the forests. All this is not doomsday preaching but acknowledgement of the disasters happening all around us. This is not a time for business as usual or hoping other solutions will come along. The forests are standing now so their benefits are immediate; and as you say, we can't win without them. Thank you for this initiative. Please make it count and don't succumb to the normal forces and monied interests that are seeking to undercut progress.	I applaud the initiative and the apparently balanced nature of the program and the advisory committee. I consider the climate emergency as paramount, and business as usual will doom our young people to a rapidly deteriorating world that is unacceptable. We cannot win without our forests and only critical logging should happen - optional uses such as early successional for non-threatened game species and biomass are optional and cannot be continued if we are to turn this around. Thank you.
charla kroll	Individual	forest steward	5	5	5	10	10	1	9	5	10	5	some of the invasive insect damage should try finding a bio control and see if that works. my beech nut trees were being eaten by red and 2 spot spider mites. I pack in soil for a spider mite predator to over winter in. took 5 years but the trees started producing seeds and sprouting more trees not from their roots. my biggest problem to date is the solar company is taking 40 acres of water and pushing it down one side of the property so that it has become a water way instead of an access road and field. this has taken a water resource from one side of my property to make it., where before it went into a settling pond, then seeped into a spring area where it feeds a creek and then pond. I did not declare that before they started because I did not expect them to do it and with so much rain this last year I did not expect that side of the property would dry out so much that all the wetland plants would die. including the beech nuts.	last night's meeting was just kind of a pro or con type meeting not anything of real substance. excuse me if my comments in you q&a section were a distraction. if you live long enough and spend enough time working in the forest you either become one with it or hate it. if you are going to get the next generation interested in saving it you must make it fun. but to leave it to itself and not take care of it, is not an option. ask candia how that is working out for them. if they had addressed a natural way to fix a disease or invasive species last summer smoke would not be a problem. teach folks how to become part of the solution not part of the problem. my hemlocks are doing great this year. charla kroll
Julie Richburg	Individual		10	9	8	8	10	4	9	9	9	8	The statements above included many concepts, so in some cases it was difficult to weigh in whether I agreed with the statements as I agreed with part of the statement, but not all of it. It would be helpful to divide the statements into the "facts" and the statement to be considered.	Thank you for your thoughtful consideration of forest management on state-owned lands. I think we all agree that there is a need for climate-smart forestry, wildlife habitat management, as well as reserves and working forests. I think the state owned lands are of outsized importance to care for the Commonwealth's biodiversity, the ability to set aside large forest tracts as reserves, and also to demonstrate climate-smart forestry to increase forest resilience as well as storage of carbon. I hope the guidelines will reflect the need to be flexible as we continue to learn more about climate impacts while also seeking to store carbon for the long term.
Elizabeth Thomso	Individual	Solar Consultant Environmental Activist	10	10	6	10	10	10	1	10	10	1		I am in agreement that our lands and forests must be protected from deforestation for large solar arrays. There are many other options, such as large building rooftops, for sitting large-scale solar arrays. My only concern is that the wording needs to be precise so that, towns, historical districts and homeowner associations cannot use the new language to stop MA residents from adding solar to their roof or a ground mount system to their personal property, (in the latter instance perhaps a maximum size limit). The law as it works for home and condo owners keeps others from standing in the way of solar adoption which we must have if we are to escape the Climate Crisis. I am an Environmental Activist first and a Solar Consultant second with my priorities in that order. Please review my comments knowing this and that I have ten years of experience in the Solar industry. Thank you for your time and consideration. Sunny regards, Liz
Rema Loeb	Individual		10	4	3	1	5	10	1	7	7	1	We should grow more hemp, which can replace wood, be good for the economy and good for soil. Hemp is a carbon saving hero.	We all agree that we are dealing with a climate emergency. All legislation must protect our state (public) forests at this time. This includes the out of control actions of DCR, who believe they are accountable to no one.
Richard Lent	NGO/Communit	Leadersship of Elders Climate Action and Sustainable Stow	10	8	8	10	9	10	5	5	7	3		Nature knows best how to nurture and manage a forest for wildlife and the health of the planet. So called “climate smart forestry” is a misnomer as it advocates for selective thinning of the forests. Nature created a livable climate, the smart thing to do is to let it do what it knows best to do.
Sharon Wyrrick	Individual		10	10	5	5	10	8	8	10	8	1	While the above questions are focused on a particular area, they are still much too general to answer with any assurance that the answer doesn't lead to a sort of blanket OK for actions that may be favorable in come cases and objectionable in others. This is a challenge with this kind of "survey" type of input. Having actual draft guidelines from the committee would provide a reality-based means of response by the public.	A draft of the guidelines has not been made available. It is unclear to me how the public input period is functioning with transparency without this being made available. Will their be an additional comment period about the draft before it is finalized?
Michael Kurland	Not listed or N/A		10	1	10	3	10	10	2	6	6	1	For the sake of bio diversity, forest health and climate change, leaving our public forests and parks wild is imperative.	The best solution for the climate is keeping our public lands wild, with no logging permitting.
Karl Dziura	Not listed or N/A		1	1	10	1	1	10	1	1	1	1	Please see my comments at guidelines@mass.gov	Sent seperately to guidelines@mass.gov

Pam Youngquist	Individual		10		10		10	10					I have left several guidelines blank in response to having greater concerns than a scale of agreement can convey. My comments on the those statements, including attachments of research papers, have been sent, on 11/19/23, to the email address you provided, along with several other foreground concerns.	Will be sending specific comments and attachments to email address provided.
Ed Klaus	Business	Owner/Operator Pine Shadow Farm	7	9	2	9	9	1	9	8	10	10	Question 13, strike the words (should only occur in limited circumstances with clear rationales') Make Plantations illegal, they take away water with minimal toxic metals removal. I ask the committee to read "The Hidden Life of Trees" by Peter Wohlleben (an International Best Seller).	Management of forests needs to change, Require maintenance every 10 to 15 yrs and remove growing stock that will never be a good tree or is diseased and use what can be. Then do an inventory of the older trees and cut the one's that are at their end of life but not gone by. This way the forest is aways doing it's best to capture carbon, and honoring the tree's that make our forest products and save the most carbon for our planet. There was two commentor's that spoke of making laws instead of incentives. Just about every other Country has laws pertaining to forest, Canada, the Scandinavian Country's, European Countries. Canada doesn't even let private forest cut without strict regulations, on public land there's law's against widths of equipment nothing wider than 8 feet I've read, that's the first law I would vote for on all forest in Massachusetts. Thank you for let me participate.
Janet Sinclair	Individual	n/a											What is the value of these statements? Is this a straw poll. Do our answers matter? Don't you have a selective group of people answering these questions? Is this then a matter of who gets their friends and colleagues to show up and answer any of this? I this is a public opinion poll, it should be conducted by a professional pollster. If you are gauging public opinion through this form, you will get a failing grade. Plain and simple	I feel that there is nothing to comment on at this time. You heard from people at the first public input session, and people already said what they think, in general terms, This second session was exactly the same. Until we can see a draft of the report that comes out of the 12 person panel, I don't see that anyone has anything more useful to say.
Dale LaBonte	Individual		10	1	10	1	10	10	1	1			14. If invasive plants are managed, it should be done with hand tools only, not chemical applications or mechanized removal. 15 This wording puts several different concepts together and cannot be answered with this scale. State-owned forest should not be cut to furnish commercial wood products.	The two stated goals of CONSERVATION and MANAGEMENT are detrimental to forest health and carbon sequestration. Instead, the goals should be PROFORESTATION and STUDY. By proforestation, I mean that state-owned forests should be kept in reserve status, preserved for the future. The only management should be minimal--to allow accessibility to walking and bicycling trails, boat ramps and picnicking areas. There should be no mechanized logging--which is incredibly destructive of soils and harmful to wetlands. Forests should not be managed for particular types of wildlife. When I say that "study" should replace management as a goal, I mean systematic, non-intrusive observation and interdisciplinary research. Currently there is no transparency or accountability to the public about activities on state land. There is no way to learn about or comment on logging projects, pesticide or herbicide applications. The contracts, parameters and results are not reported. This is unacceptable, given that experiments such as "restoration" of plots to turn them into "pine barrens," are ongoing experiments with no scientific standards. Our state lands have been treated as extractive resources for loggers and zoos for those who hunt and fish. They are also exploited by others who seem to be some kind of forest landscapers. Our forests are among the few intact forest ecosystems in the country. They should be preserved as important islands of ecosystem health that can anchor and extend the work of communities and individuals. Municipalities are expanding their urban forests while suburban home-owners are establishing what Tallamy calls "home-grown national parks:" native plantings that support pollinators and biodiversity. Connected as wildlife corridors, these projects combine with our state-owned lands to create a critical resource to address climate change.
Aaron Townsley	NGO/Communit	Chapter Board Member - New England Chapter of Backcountry Hunters & Anglers	7	9	4	7	8	2	8	7	8	5	A critical concern for Backcountry Hunters & Anglers is that our state biologists at MassWildlife and DCR have the resources and flexibility to protect the vast array of habitat and species in the Commonwealth. We want to ensure that great work is fully supported and funded as a priority in any forestry management policies moving forward.	The New England Chapter of Backcountry Hunters & Anglers thanks you for this opportunity to provide testimony regarding the Forestry as Climate Solutions. A core tenet of BHA is the protection of our public lands and waters using science-based management policies so that current and future generations can connect with these places; be it for recreation, sustenance, or a deeper personal connection to the wilderness. While carbon sequestration is absolutely critical, building resilient landscapes capable of withstanding the increasing impacts of a changing climate is ultimately paramount. Optimization of carbon sequestration should not drive forest management at the expense of other critical ecosystem services. It must be integrated into a broader set of objectives. A single drought, fire, storm, or pest outbreak can rapidly undo long-term carbon sequestration efforts. This summer we all experienced the wildfire smoke that choked most of the east coast as millions of acres of un-managed forests burned in Canada. In a state as densely populated as Massachusetts, how can an argument be made that any of our forests can be shielded from human impacts? How can we propose un-managed forests if we know we may have to fight wildfires here? Prioritizing both forest resilience, and the protection of a diverse range of critical habitats is crucial for protection of the Commonwealth against the worst effects of climate change. Agencies like MassWildlife and DCR have already achieved victories in this regard. We must ensure our state biologists have a permanent seat at this Committee's table. They are the public's agencies tasked with protection of all our state's species from common game to our most endangered, and their experience should help shape future policy. Our limited public lands must prioritize objectives that are less achievable on private lands. These public land objectives should include protecting rare habitats and species, promoting resilient landscapes, and safeguarding clean water sources. By some estimates the totality of forests within the Commonwealth could address 14% of our carbon sequestration needs. Our public lands are just a fraction of that potential 14%. Given that the vast majority of forests in this state are privately owned, we must prioritize the creation policies that incentivize private landowners to maintain healthy forests as it is private lands that are under the greatest threat of deforestation by commercial or residential development and poor forestry management. We all want to see our forests and critical habitats thrive as we seek a path to a more sustainable future. The members of

Matthew DiBona	NGO/Communit	District Biologist, National Wild Turkey Federation	10	7	6	5	8	3	10	10	10	10	Re: Forest Management For Wildlife: Identifying carbon sensitive practices is important but I would not want to see restrictions on using best management practices that are needed to support young forest and early successional dependent wildlife. We've seen regional declines in many species of wildlife because we are not creating enough young forest/early successional habitat. Prioritizing reducing carbon emissions associated with habitat management practices would be in opposition to some of the priorities identified in the state wildlife action plan. Re: Disturbances. I agree that disturbances are important for all the reasons stated above. However, if the frequency and intensity of forest disturbances will increase in the future, too much disturbance may actually negatively impact forest health and resilience in both the short and long term. Our forests are vulnerable due to previous land use history and we live in a human influenced landscape. We need to increase the resiliency of our forests now through ecological silviculture now to better prepare them for the challenges of tomorrow. Re: Carbon stocks and sequestration. The rationale for establishing forest reserves should NOT be carbon stocks and storage. Reserve design should be used to protect important plant and animal communities, critical ecological processes, etc. Carbon should be an ancillary benefit. Management should be allowed in reserves to support the goals and objectives associated with reserve establishment. Re: Resilience. Our forests are not equipped to deal with current and future stressors, including invasive pests and diseases, changing climate, increased weather events, etc. We need active management to accelerate the development of resilience so that over the long-term we are realizing carbon, wildlife, water, and wood product benefits.	NWTF appreciates the work of the EEA and the Climate Forestry Committee in developing climate oriented forest management guidelines and hosting another public input session. However, we would like the opportunity for public comment on draft guidelines, prior to guidelines being finalized.
Brittany Gravely	Individual		10	10	9	8	10	9	4	7	8	5	I think that state forests should have complete protection and be left completely wild—with management only in dire circumstances. Perhaps others could be somewhat managed with responsible forestry, such as practiced by indigenous nations. The problem is that once there is a loophole, loggers will take full advantage.	Hello, I support full protection of forests on state lands, which means actual laws and rules rather than just guidelines that can be easily violated. Mature forests should be wild, with intervention taking place only when absolutely necessary for the health of the ecosystem. Unfortunately, human intervention usually means logging and deforestation rather than actually caring for these areas that are increasingly vulnerable. Transparency is also a must during this and all legal processes surrounding Massachusetts' wild areas. The forests provide so much, yet they remain as endangered as many of the species they house. It is time we treated them with the respect and care they deserve.
Andy Finton	NGO/Communit	Senior Conservation Ecologist, The Nature Conservancy	10	6	10	10	7	10	8	9	9	10	Comments supporting the ranking of the Statements above: Question 6: Keep forests as Forests: This is likely the highest priority to achieve the goals of the Forests as Climate Solutions initiatives, and the Clean Energy and Climate Plan. Unless we protect a connected network of resilient forests, we will not be able to achieve our biodiversity and climate goals. The decisions we make now will define the trajectory for the next 30 years and beyond. The new BioMap defines areas that support Forest Interior, Resilient Landscapes, and Regional Connectivity, and provides a vision and road map for success. We continue to lose forest, and getting to No Net Loss for all forests, not just protected forests, is imperative. Question 7: Forest Management for Habitat: The Nature Conservancy supports the creation and maintenance of habitat for species that require open, shrublands, grasslands, and young forest (early successional habitat). We recommend clearly defining which lands will be managed for these purposes (public and private), and focusing these management practices within those areas. If the locations of this management regime are poorly defined, and shift over time, it will undermine the ability to secure the other forest values. We also need to acknowledge that there are many forest habitat types, beyond early successional, and old forests provide unique habitats that are important for the diversity and abundance of many species and ecological processes. Question 8: Disturbances: Yes, disturbances are a critical aspect of forest ecology and have been for millennia. They create habitat, add structural and compositional diversity to our forests, and provide resilience. These disturbances are most beneficial when they play out on large, minimally fragmented forests, highlighting again the need to conserve forests at scale in MA. We have an opportunity to study this phenomenon in real time, monitoring the response of the 10,000 acres of forest significantly impacted by the 2011 tornado in and around Brimfield State Forest. This, and other natural disturbances can, and have, created early successional habitat. We also acknowledge that some disturbances have anthropogenic origins (e.g. Nonnative forests insects and pathogens, extreme climate events); yet, disturbances are still critical as described. Question 9: Carbon Stocks & Sequestration: This is a complex topic, with many nuances, and a substantial literature. However, we completely agree with the statement, i.e. “managing for a diverse range of ages and developmental stages across forest landscapes is the optimal means of promoting carbon sequestration and many other forest ecosystems services.” Question 10: Forest Soils: It’s true that “Forest soil carbon can be protected by requiring harvesting practices that reduce forest soil disturbance”. However, there are also other strategies and variables to address to protect soil	Please see comments related to each statement in Question 16 below. In general, strategies should be designed to protect and manage forests for multiple benefits, not solely Carbon.

Wynne Treanor-K	NGO/Communit	Nashua River Watershed Association Community Programs Director											Nashua River Watershed Association comment on forest reserves: What role should humans play in optimizing carbon storage and sequestration in forests? When it comes to our Public state-owned forests, humans should play as passive a role as possible. Let those forests owned by the private sector be actively managed if the landowners wish them to be. For our Public state-owned forests, the definition of Forest Reserves should be equivalent to wildlands, as defined in the Woodlands and Wildlands Initiative. At present, less than 2% of our Public state-owned forests are in Reserves. The Woodlands and Wildlands Initiative recommends this be increased as soon as possible to 10 or 20%, if not more ("30 by 30"). Human intervention is neither required nor desirable in wildlands. We have no way of knowing at this time what alleles are present in certain trees that will make them more resilient to climate changes – they may no longer be present in the young forests that would replace them if cut. We need to let nature take its course to the extent possible in our public forest reserves. In the face of a very uncertain future, we need to do everything possible to protect our planet against warming, and not let it be determined by a current limited view of what is defined as a "healthy forest".
Nancy Lee. Woo	NGO/Communit	Professor of Sociology/Sustainability Studies. Bristol Community College Board Member. Biodiversity for a Livable Climate	10	10	5	7	9	1	6	10	10	3	Public forests must be protected to the greatest extent possible - not only for purposes of carbon sequestration but for groundwater retention, biotic pump activity, and planetary cooling.	Forests as Climate Solutions Submitted by: Nancy Lee Wood, Ph.D. Professor of Sociology/College Sustainability Educator Board Member: Biodiversity for a Livable Climate 74 Purchase Street Taunton, MA 02780 Telephone: 508-828-1857 This past summer of 2023 has been the hottest on record - with future summers projected to be hotter still. Needless to say, it is of the greatest urgency to cool the planet. Water is Earth's natural cooling system. Forests do much more than sequester carbon. They play a critical role in regulating EARTH's water circulation and temperatures. A recent report from the Desert Research Institute indicates an alarming decrease in groundwater worldwide. Deforestation, over-grazing, industrialized agriculture, and urbanization are key factors in soil destruction and aridification - obvious indicators of water loss off the land masses of the planet. In the United States some 45% of 80,000 wells have shown a significant decline over the past 85 years. More than 75% of the Earth's land area already is degraded. Moreover, it is estimated that 90% could become degraded by 2050 - further indication of water loss from the lands. It is a stark reminder that all this loss is of FRESHWATER - water upon which all land-based life depends. We MUST protect existing forests and reforest areas throughout Massachusetts - and New England - and ultimately across the planet - including the planting of Miyawaki Forests in urban areas. Discourse on the role of forests in climate solutions must go further than carbon drawdown. It must also include the central role that forests play in cooling the planet through regulation of water and its impacts on temperature.

Lynne Man	Individual	This is submitted as two individuals: Lynne Man and Nancy Polan (nancypolan@gmail.com)	10	1	10	2	5	10	3	6	5	1	Q6: Strongly agree Q7: This question assumes that human creation of early successional habitat is a proven scientific strategy for optimizing ecosystem health. We fundamentally disagree with this assumption. First, there is lots of open space for early successional habitat without the need to artificially create such spaces. Second, such spaces were not as abundant in pre-colonial times, so we do not see the need to create more than were originally on this land. Q8: Strongly agree Q9: The first sentence of this statement is true. However, there are problems with the rest of it. First, younger forests may sequester carbon at a higher rate, but due to a the lower amount of total leaf canopy and biomass, it is questionable whether they actually sequester more total carbon and they certainly store far less carbon than older forests. So why would you manage "for the narrow life stage of maximal carbon sequestration" when if you leave it alone, sequestration capacity as well as storage overall will continue to increase? (Stephenson, N. L., et al. "Rate of Tree Carbon Accumulation Increases Continuously with Tree Size." Nature, vol. 507, no. 7490, Mar. 2014, pp. 90–93, https://doi.org/10.1038/nature12914.; Keeton, William S, Andrew Whitman, Gregory McGee, and Christine Goodale. "Late-Successional Biomass Development in Northern Hardwood-Conifer Forests of the Northeastern United States." Forest Science 57, no. 6 (2011): 489.) Q10: This depends on what the "harvesting practices" entail, i.e., use of chain saws instead of feller-bunchers, for example, would promote this goal. It is doubtful that soil integrity can be maintained using currently available equipment and practices. If loggers would use less intensive equipment and methods to remove wood, this goal might be possible. (See, for example, Mike Dockrey, Indigenous Perspectives on Novel Forests and Ecosystem Change, Yale Forest Forum, November 6, 2023, https://yff.yale.edu/speaker/mike-dockry) Q11: Strongly agree Q12: This depends on what is driving such decisions. While state agencies declare that they do not have a profit	We will submit general comments in a separate document
Susan Purser	NGO/Communit	Coordinator, Preserve October Mountain	10	1	7	1	10	10	1	3	7	1	Our precious forests should not be used for CLT. All-wood buildings are a luxury we cannot afford as a society given the climate crisis. We need all the standing trees we currently have. In addition, the amount of carbon stored in long lived wood products is only 16-20% after harvesting, transportation and fabrication. The chemicals in the epoxies used for CLT also pose a serious contamination threat.	Please have a public session so we can hear about the proposed plan that the Board is finalizing. I do not believe in the concept of "Climate Smart Forestry". The best way to utilize forests in the fight against climate change is to leave them alone except where immediate public safety is involved. 20% of our emissions can be absorbed by forests if they are "unmanaged". Wood products should be sourced from private lands and greater conservation/recycling of wood is needed. Single use products such as toilet paper and paper towels should not be made from virgin trees. CLT requires too much wood and involves too many chemicals.
Daniel G Leahy	Individual		10	7	7	4	10	4	6	8	7	9	Again, Please allow the public the opportunity to review and comment on the Draft Report of the Committee	Please allow the public to review and comment on the Draft Report of the Climate Forestry Committee. Thanks, Daiel Leahy
Josh Rapp	NGO/Communit	Senior Forest Ecologist, Mass Audubon	10	8	10	10	10	5	8	8	10	10	Keep Forests as Forests – Additional conservation of forest land should focus on forests that possess high resilience to climate change and other stressors. Traditional conservation values such as increasing size and connectivity of protected lands and protecting rare and sensitive species and habitats also continue to be important. Forest Management for Habitat – Considering the carbon impact of habitat projects is important, but should not be the only or primary consideration for where and how to create and maintain habitat. The spatial arrangement of habitat and connectivity with other habitats is often important for optimizing the value of early successional habitat. Ultimately, optimizing the value of early successional habitat will be carbon sensitive because less habitat will be needed to maintain populations of dependent species, even if the carbon cost of habitat creation on a per acre basis is higher in some cases than an alternate scenario. Disturbances – This is a statement of fact and doesn't imply any particular management approach. I would propose that monitoring and responding to disturbance is an important management value. This response could include: land protection (land may be susceptible to ownership change and/or development after disturbance), tending to regeneration (including invasive plant management, planting seedlings), and ensuring access (clearing roads and trails) for monitoring and safety. Removal of dead trees may also be recommended in fire prone areas or where the benefit of long-term storage of carbon in wood products is worth the cost of entry. Where salvaged wood can displace the wood harvested from undisturbed forests, this may be a benefit of conducting a salvage harvest. Resilience – While Massachusetts forests are resilient compared to forests closer to their bioclimatic limits (for example, western forests susceptible to large scale fire), the scale of threats to forests from climate change, the introduction of invasive species via international trade, and unbalanced wildlife populations (especially high whitetail deer populations) is such that it is unknown whether our current forests can adapt to these changes and maintain their values and benefits without management. Similarly, given the rapidly and directionally changing climate, we also don't know with certainty the best way to employ active management to maintain these values and benefits. It is important to maintain some areas free from human disturbance, while employing scientifically designed active management in other areas, and closely and rigorously monitor both to learn best practices and adaptively manage forests for the greatest benefit. Invasive Insects & Disease – Where threatened trees can be efficiently converted into long-lived wood products, there can be a carbon benefit to proactive harvesting in response to insect and disease infestations.	Forests hold many intrinsic values and provide a wide range of benefits, including wildlife habitat, clean air and water, timber and other forest products, human health and recreation, and climate regulation through carbon sequestration and storage. These values and benefits are challenged by a changing climate and numerous other stressors including pests and diseases, excessive animal browse, and competition from invasive plants, which all have their origins in the actions of people. People therefore have the responsibility to protect, restore and maintain forests. The process for doing so should both address root causes where possible and increase the resilience of forests to these stressors. Managing forests for resilience will maintain the values and optimize the benefits forests provide in most cases. Addressing root causes includes lowering greenhouse gas emissions, eradicating (or at least suppressing) invasive plants, controlling pests and diseases (for example through biological control) and deer populations, reducing forest fragmentation and increasing connectivity (through land protection), and allowing natural processes to dominate the growth and development of forests where these external stressors are minimal (through designation as reserves). Increasing the resilience of individual forest stands can be achieved by encouraging forest structural and species diversity through thoughtful silviculture. Silvicultural practices to enhance resilience include thinnings and crop tree release (which increase the vigor and growth of the trees that remain), regeneration harvests (to encourage the establishment of new trees that will become the future forest), planting a diversity of climate adapted trees, and protecting both planted and naturally established young trees from deer browse (through cages, fences, slash barriers). We are dealing with the dual crises of climate change and biodiversity loss, and how we manage forests needs to be considered in how we confront both crises. Maintaining the full complement of forest-dependent biodiversity in Massachusetts requires maintaining all forested ecosystem types and successional stages on a landscape that contains only about 60% of the forest that existed prior to European colonization and where disturbance (in the form of fire, floods and beaver activity) is reduced. Active management is needed to maintain species of disturbance-dependent habitats. Forests have a role to play in addressing the climate crisis as well, both in their ability to store and sequester carbon and in providing local natural materials that can be used instead of materials with a higher carbon footprint. Compared to other states in New England, Massachusetts forests currently sit at or near the top in both the amount of carbon they store and the carbon they sequester on an annual basis per acre (based on US Forest Service data), suggesting that current forest management regime has been largely successful in providing carbon benefits. However, the amount of wood harvested in Massachusetts is only about 5% of what is consumed in Massachusetts. Provisioning more of the wood we consume locally (and regionally) would be more equitable, provide local economic benefits, and have carbon benefits

Michael Kellett	NGO/Communit	Executive Director											I have not provided ratings for any of the statements above. These statements are so biased, inaccurate, and/or self-contradictory that it is impossible to answer them without validating these misleading statements. As a result, this is not a credible survey and it cannot be depended on to provide a fair and objective representation of the views of the public on these issues. This problem is representative of the state's entire public process regarding forest management and climate change. Most people do not even know this process is happening. Of those who do, most will be confused or will not recognize the subtle biases in these statements. Moreover, because most citizens will not be involved at all, this process is not legitimate in providing direction for management and protection of Massachusetts public lands in the coming months and years. This is a perfect example of why more and more people are supporting state legislation that reflects the wishes of the public to halt logging on state lands, ensure their permanent protection, and offer incentives to help private landowners keep their forests intact and free of logging. I reiterate that the Commonwealth of Massachusetts should designate all state lands as permanent reserves that are off-limits to logging and other intensive management. Nothing short of this will adequately address the climate and biodiversity crises and their impacts on the people of our state.	The Commonwealth of Massachusetts should designate all state lands as permanent reserves that are off-limits to logging and other intensive management. Only about 1% of the state now have this protection. Protecting all state lands would increase the total to about 13% of the land base. This still falls far short of the goal of providing this protection for 30% of U.S. lands and waters, but it would make Massachusetts the leader among the New England states as well all other eastern states. The assumption underlaying “active management” (i.e., logging) of state lands is that this necessary or beneficial for forest health, resilience, adaptation, wildlife, invasive species mitigation, fire control, water quality, and carbon sequestration. We reject this assumption, which has no basis in objective science. This assumption has tainted the entire forests and climate process as well as this public comment tool. We oppose an increase in wood production to meet a greater proportion of demand. The protection of forests to address climate change, the protection of biodiversity, and the provision of ecosystem services for people should not be tied to the desire to meet endlessly increasing demand for wood and forest products. It is particularly disturbing that the state is promoting increased wood building construction as a climate solution. There is ample scientific evidence that this is a false solution that will encourage more forest exploitation in Massachusetts with no assurance that there will be a corresponding reduction elsewhere. The level of logging in the U.S. and worldwide is already far too high. Massachusetts should be a leader in reducing wood demand, encouraging recycling and reuse, rehabilitating existing structures, and promoting alternative construction materials. Instead, the state is catering to the wishes of the timber, wood products, and biomass industries, which benefit from continued exploitation of our public forests. This process is unfair and undemocratic. The November 14 public session was presented with no information provided beforehand. Citizens had no time to review the materials or develop any thoughtful responses. The deadline of November 21 for public response is completely inadequate — especially coming during a holiday week. This appears to be an attempt to push the process through as quickly as possible by limiting public comment and controversy.
William Hill	Individual	Retired Forester	10	3	7	7	5	1	10	2	9	10	Regarding statements as respectively numbered: 7) Habitat for species that require young forest structure and grasslands have been displaced primarily by development. Recognizing that these species and their habitat are important in diverse ecosystems, we humans must create and or maintain that habitat where it might not have occurred (often) in ecological history. I believe that the state agencies who are charged with making those decisions have done well over the last decades to attain that objective by evaluating the science and making decisions through their current written guidelines and plans. The evaluation of the science should continue to inform decisions. 8) The use of commercial and non-commercial forest management techniques, including prescribe fire can and should be used to simulate and augment the results of natural disturbance. 9) I agree heavily with the last sentence of this statement, perhaps a 10 ranking, but the previous portions of the statement cause me to pause. The diversity of ages and developmental stages will be gauged to the agencies mission; goals and objectives. For example, there may be more emphasis on young forest habitat on DFG - DFW lands, or perhaps more emphasis on total landscape diversity on DCR - DWSP and DSPR lands. The individual land managers can and should be cognizant that different management decisions will have cost benefit results (to carbon storage and sequestration) on other areas of the landscape. 10) Again, I agree heavily with the premise but I believe that the MA Forest Cutting Practices Act, one of the most stringent in the US, with the MA - DCR Service Forestry Program administering it, does an excellent job of fulfilling the concept brought forth in the statement. I DO NOT believe that further regulation is needed. 13) Asian long horned beetle, emerald ash borer, and spongy moth are considered established. Land managers must be allowed to be proactive to respond to resource damaging population spikes in these insects to protect property infrastructure and salvage the value of the resource. Salvage and pre-salvage, when fully vetted is important are tools in the tool box.	I would encourage EEA to look carefully at the data gathered from state lands for decades. Consult those who analyze the data. Simply put, this data coincides with the science, of which there is a preponderance, that indicates a well balanced intentional approach to forest management can provide excellent carbon storage and sequestration benefits, locally sourced wood, diverse wildlife habitat, and increased protection to water supplies. Do not be afraid of the fact that the forest resource has a value and can produce revenue to improve infrastructure and recreational facilities. It is an investment. Be candid about it - it is good ecological and financial stewardship.

Moussa Siri	NGO/Communit	Executive Director	8	8	7	7	7	8	7	6	8	7	Thank you for the opportunity to comment on the “Forests as Climate Solutions” initiative during this second public hearing. Knowing the value of forests to water resources and their role in carbon sequestration, it is important to actively manage at least a portion of the forest to maintain a healthy forest. The Water Supply Citizens Advisory Committee (WSCAC) supports good active forest management in general and in the MWRA water reservoirs singularly for the following reasons: •Good forest management will maintain or improve water quality and availability for the MWRA communities, •Good forest management will increase forest carbon sequestration and reduce MWRA’s carbon footprint, •Logging is necessary to create an uneven-aged and diversified forest around the MWRA water reservoirs, and the regeneration needs to be effective to create this uneven-aged and diversified forest. However, bad forest management will: •Lead to a decrease in water quality and availability in the long term if the logging is not done right •Limit the expected regrowth (not an exhaustive list) if: oThe size of the opening is too large (risk of regrowth of even-aged trees), oThe size and the conditions in which equipment is used lead to soil compaction, larger size openings, the destruction of advanced regeneration that would support the uneven-aged regrowth, and damage to some standing trees not included in the cut, oAnimal browsing on exposed young sprouts. WSCAC has, in the past, brought up some concerns about the lack of regeneration in some of the logged plots (due to some of the above causes) because this lack of regeneration can, in the long run, decrease the forest water filtration and carbon sequestration capacity. The sole goal of WSCAC in providing these comments is to support and recommend that for public lands: •The laws define the size and types of equipment to be used for logging and requirements (conditions to be met to operate the equipment) to be followed during harvesting to avoid soil compaction, destruction of advanced regeneration, and damage to standing trees not included in the cut, •The laws define the size of plots scientifically proven to be indicated for diversified forest age and species, •The laws require a periodic visit of logged plots to ensure the effectiveness of regrowth and indicate necessary measures
Laura Haight	NGO/Communit	Partnership for Policy Integrity	1	1	10	1	1	9	1	1	1	1	Many of these statements are ambiguous, misleading, or self-contradictory. This made ranking on a scale of 1-10 challenging. While we were tempted to boycott these questions and leave them blank, we opted to rank any question that fell into this category as a “1” (“strongly disagree”), even if it contains some statements that we agree with. PFPI is submitting a letter explaining our answers to provide context and nuance.	Please see PFPI's letter (sent via email to guidelines@mass.gov).
Greg Franceschi	Government	Volunteer Board Member / Deerfield Energy Committee	10	10	5	10	10	10	5	8	10	3	I think state lands should be left undisturbed, with the exception of infestations that can be nipped in the bud, but that it should be made easier to harvest wood locally on private lands so that we aren't wasting fuel and adding to the climate crisis by moving wood great distances that could be sourced nearby.	Forest and Trees, not the forest for the trees! We need both.
Alexandra Dewey	Individual	Retired	9	7	8	9	10	2	8	8	9	7	New "Guidelines" will not necessarily ensure that goals are met. There are strong reasons to have "Rules" and third party oversight so that transparency and accountability are present, goals are clearly understood, and available to the public. State forest and watershed lands have strayed from management plans which should reflect evolving climate change science. The relationship between logger, forester, and state land management plans has changed. Plans are interpreted differently according to who oversees the state forest land. "Guidelines" are not likely to increase the clarity needed to ensure climate change goals are met. Sometimes "Rules" provide the focus and authority needed to move forward together toward a common goal instead of each going in a separate direction that they think is right.	November 21, 2023 Thank you for the opportunity to submit comments on the second public hearing of “Forests as Climate Solutions”. I support the pause in logging to focus on the development of climate-oriented management guidelines that increase carbon storage and resilience to climate change. However, as mentioned during the hearing on November 14th, guidelines are suggestions. If change in management is the goal on public lands, rules, not guidelines will be needed to ensure the changes are actually put in place. I recommend third party oversight for accountability, transparency and public support. This has been successful in the past with DWSP watershed lands and is currently being accomplished on New England Forestry Foundation lands. These comments focus primarily on DCR-DWSP forest management on watershed lands to maintain water quality for MWRA rate paying communities, and retain the annual filtration avoidance waiver required by MassDEP. As a Pelham resident living in a Quabbin watershed community, I support active forest management for the following reasons: •The need to remove dead and dying trees to provide an improved environment for growing healthy trees •The ability to actively monitor forest health by working to control invasive species, insect damage and disease, and browsing by deer and moose •The opportunity to promote diversity and resilience in forest management Management on DCR-DWSP watershed land is unique because it does not require the generation of revenue. Foresters are encouraged to take a long view on management and use methods that improve soil health, species diversity and regeneration leading to a variety of age classes. The following factors play a negative role in the ability to meet the goals of a healthy resilient forest: •The use of heavy equipment has affected soil health. Compaction, rutting and the use of whole tree harvesting has damaged forest soils and impacted regeneration. •Browsing of moose and deer, despite deer hunting, has affected regeneration efforts. •A decline in selective harvesting/thinning and an increase in clearcutting/leaving fewer healthy trees onsite after logging has affected the regeneration of favored species such as oak. The use of heavy equipment causes wider and deeper skid trails, and damage to remaining trees alongside these trails. In summary, I support the development of forest management guidelines based on the evolving climate science. To
Keith Ross	Individual	Senior Advisor LandVest, Inc.	10	6	8	10	8	7	7	5	5	7		Increase the pace of land conservation to insure the best forest management possible once the development carrot is removed.

David Croll	NGO/Communit	Chair of Sustainability Committee of the Trustees of Reservations	Is there a recording of the recent hearing that I could share with the members of my committee at the Trustees of Reservations. We have 20,000 acres of forests and are very interested in how best to manage them (or not) to created maximum carbon sequestration.