As to the role humans should play, the state should follow the scientific consensus that unmanaged forests accumulate the most carbon and stop logging state-owned forests. As we reach the 1.5 degree climate change tipping point threatening the survival of humans and species worldwide, Massachusetts must reduce its atmospheric carbon contribution. Suggested tradeoffs to increase the numbers of state-listed species are questionable. Most, if not all, remain rated as low conservation priority nationwide. The pre-Colonial presence of larger numbers of many listed species is disputed by independent scientists (<https://www.nature.com/articles/s41893-019-0466-0> ). Expending tax dollars to log forests and release carbon is an unnecessary addition to climate change. Regarding clean water availability, Drs. Foster and Orwig of Harvard Forest point out that , “From a biogeochemical, ecosystem function, and water-quality perspective there is strong evidence that a no-management policy is prudent.” (<https://harvardforest.fas.harvard.edu/sites/default/files/Foster_ConservationBio_2006.pdf> 968).

Because development cause the greatest loss of forest cover in MA at a rate of 5000 acres per year, the state should enhance Chapter 61 incentives enough to attract more private land-owners into the program to provide a source for local wood products, provide logging jobs, and obtain all of the ecosystem services theoretically provided by active management. During the *Forests as Climate Solutions* initiative first public comment period, the public was informed that “only” 1450 acres of state-owned forest land is logged annually. Since this number is so small, enhancing Chapter 61 to reach an increased goal of 1450 acres of private land should be a reasonable goal.

As to the definition forest reserves:

The Wildlands *in New England* report urges that at least 10 percent of the region should be set aside as Wildlands, an amount about equal to our state-owned forest land. Therefore, our state-owned forests should be defined by state law as Wildlands in perpetuity. Doing so will protect biodiversity while providing for quiet enjoyment through low impact activities. The announcement of the *Forests as Climate Solutions* initiative includes the statement that a group will be convened to consider adding to Reserves. We’re being asked to comment on Reserves with inadequate information. Citizens should have access to the proceedings of this group and be part of its decision-making process. A priority for Reserves should be expanding the existing DCR Reserves and including under Reserves more, or preferably all, of the land currently designated by DCR as Woodlands.

The process for distinguishing Reserves from Woodlands during the original *Forest Futures Visioning Process* was unscientific and discounted public opinion, at least for Conway State Forest. The forest was rated as ”moderate” in terms of qualifying as a Reserve. The Conway Town Conservation Commission at the time recommended it be declared a Reserve as did nearly everyone who commented. The only public dissent came from the Northampton Water Supply Division. DCR decided to declare it a Woodland despite its potential and the expressed wish of local people to make it a Reserve. Last year the Conway Town Selectboard once again declared the wish that the Conway State Forest be designated a Reserve. Representative Natalie Blais told the Selectboard that then-DCR Commissioner Rice was coming out to visit the Conway State Forest, but this visit never occurred. This example does not indicate a very well founded process for decision-making, one that, once again, discounts public input.

Forest health and climate change.

Forests will adapt to climate-change induced warming with the expected Northern shift of species. DCR states in its "Massachusetts State Forest Action Plan," (<https://www.mass.gov/doc/massachusetts-forest-action-plan/download> 86) "It is unclear exactly how climate change will influence forested environments…” Given this uncertainty, we should follow the advice in *Wildlands in New* England: A first rule for all managers is to pause to consider the benefits of passive management as an alternative to active management, even in the face of novel processes like invasive organisms and unprecedented environmental change. After all, the past five centuries of New England history have witnessed a continuous series of novel physical, chemical, and climatic stresses and disturbances to the region’s ecosystems (Foster et al. 1997).” The forest we now have were shaped by these five centuries of novel stresses and primarily degraded by human activity including logging. We should expect Nature can govern our state owned forest land in the future.

General Comments:

Comments submitted during the “Central Highlands Kickoff” event last year were never posted nor received any response. During the *Forest Futures Visioning* 10 Year Review process last year, DCR Director of Forestry Peter Church promised to answer submitted questions, but despite my providing monthly reminders, those questions have never been answered. Director Church also said twice during the *FFV Review* process, before comments began, that he didn’t expect much would change. These examples illustrate the fate of public input from anyone who opposes current policy regarding state-owned forest policy. I expect these comments will suffer the same fate. I would be pleased to be proven wrong.

When the Healey Administration announced the *Forests and Climate Solutions* initiative, it also announced the intent to resume logging on state land after December 2023. This decision was made without explanation. Closed door decision making is undemocratic and unscientific. In contrast to the approximately 1500 loggers in the state of Massachusetts, 4800 people signed a petition delivered to Governor Baker in 2022 and this decision completely ignored that petition and those sympathetic to its message. The decision is also contrary to the Massachusetts State Democratic Platform 2021 that pledges “an end to logging on public lands” (<https://drive.google.com/file/d/1RZf7sCpTmuvgP4CkEuxdvhAUDxebRBML/view> p.13).

Similarly, the forest guideline committee’s proceedings are not being made public, nor is there any ability for the public to take part of this decision making discussion. The discussion of this group would provide valuable information. Soliciting comment before providing information leads to poorer quality public comments while undermining citizen faith the process. The composition of the group includes five foresters who cannot be objective because they depend for their livelihood on writing plans to log lands. Furthermore, they are not scientists, contrary to the claim that the state is proceeding on the basis of the best science. Massachusetts has historically failed to make public the scientific support for its forest management decisions and this *Forests and Climate Solutions* initiative process is, unfortunately, continuing this tradition.

I walk in state-owned forests almost every day, and since I find the least managed ones have the qualities I prefer, I advocate for leaving them alone. However, I would be hard –pressed to decide which issue animates me more, the logging of our state-owned forests or the failure of the state to provide complete and unbiased information and have a genuine dialogue about it. I have had numerous requests for information ignored or denied even after my elected representatives had requested responses from DCR and EEA more than eight times on my behalf.

While 1450 acres of annual logging seems negligible to state authorities, for those of us in Western MA, the impact feels much greater. The distribution of Woodlands where DCR logs compared to the Reserves and Parks where logging is much more limited is very uneven. The bulk of the Reserves and Parks are east of Worcester and virtually all the logging so far has taken place in Franklin, Hampshire, and Berkshire counties. I would provide specific information, but since my requests to the state for such information have been repeatedly denied, including FOIAA requests, I have to rely on what I have gleaned from DCR district RMPs, which show:

**Percentage of Parks, Reserves, and Woodlands in W. MA DCR District**s By Percentage

|  |  |  |  |
| --- | --- | --- | --- |
| district | Parks | Reserves | Woodlands |
| Northern Berkshire 2008  <https://www.mass.gov/doc/northern-berkshire-district-forest-resource-management-plan/download> p.10 |  | 29 | 70 |
| Central Berkshire District  [**https://www.mass.gov/doc/central-berkshire-district-forest-resource-management-plan/download**](https://www.mass.gov/doc/central-berkshire-district-forest-resource-management-plan/download)p. 19 | 2 | 2\* | 97 |
| Western Connecticut Valley <https://www.mass.gov/doc/western-ct-valley-forest-rmp-final/download> p.9 | 8 | 39 | 53 |
| Southern Berkshire  <https://www.mass.gov/doc/southern-berkshire-district-forest-resource-management-plan/download> |  | 23 | 68 |
| \*Extrapolated from available, though dated, information. | | | |
| Average: 26 percent total Parks and Reserves Western MA RMPs | | | |

Though the state committed to 60% Reserves and has apparently met that goal, the percentage of DCR lands with minimal logging in Western MA is little more than half that number. I will also add that anyone with even minor physical limitations, like me, cannot access many Western MA Reserves because they are too steep, one of the reasons they are not logged. As one citizen from Eastern MA commented, folks in the eastern part of the state do not know the state logs our lands, an unawareness fostered by this imbalance in the distribution of Reserves and Parks. State Forest Woodlands that I visit on a regular basis like Conway, Northfield, Pelham, and Wendell State Forests are all slated next for Resource Management Plans that will determine how much they will be logged. I was informed by DCR that logging in Conway State Forest will take place over a period of years, a period during which, while trying to quietly enjoy nature, I will have to contend with logging trucks, landing zones, and the noise of buncher-fellers. The logging that authorities repeatedly try to minimize will have very real and disturbing impact on me and other local citizens who cherish these forests and who regularly visit them to enjoy the solace nature provides.

In regard to shaping policies governing state-owned forest land, the state has fallen short in providing scientific data and information before public comments are solicited, including the input of all stakeholders, and having a balanced, good faith public discussion and decision-making process. When the moratorium was promised during the Healey campaign and then occurred, silently, advocates opposing logging had hope that the *Forests as Climate Solutions* initiative would make up for these shortfalls. Unfortunately, up to this point, The *Forests as Climate Solutions* initiative has largely continued the tradition of the state paternalistically making decisions for the supposed good of its citizens while discounting the concerns of thousands of citizen-stakeholders. The state still has the ability to make this process truly democratic and science-base and I strongly urge that it do so.

Karl Dziura

Conway, MA