

# MASSACHUSETTS FOREST ALLIANCE

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September 15, 2023

Stephanie Cooper, Undersecretary for Environment  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, 10<sup>th</sup> Floor  
Boston, MA 02114

Undersecretary Cooper:

Thank you for holding a public feedback session and for the opportunity to submit comments on the Climate-Oriented Forest Management Guidelines. We represent forest landowners, foresters, timber harvesters, and forest products companies in Massachusetts.

As you know, we opposed a moratorium (or “pause”) on forest management on state lands. This has been a difficult year for many of our members. Some mechanized timber harvesters lost a third of their business for the year with the pause. While farms have gotten much of the attention related to the heavy rainfall this year, it has also affected the forest economy, as the woods have been often too wet for harvesters to work. That has a ripple effect, as local sawmills have struggled to maintain a wood supply. Some mills have largely shut down, operating as little as one day per week – and unlike farmers, there has been no financial support for timber harvesters or sawmills. We have seen some of our members retire earlier than they planned and have seen other members pack up and move to the southeastern states, where there are more job opportunities and less reflexive opposition to forest management.

We don’t particularly object to the idea of the expert panel itself, although we think it has the potential to be largely duplicative of work already conducted, including the DCR Climate Forestry program contracted out to the New England Forestry Foundation and Mass Audubon. That program has already trained consulting foresters on climate-smart forest management guidelines, but appears to be largely on hold given the expert panel process, and it is unclear if the program will be abandoned, changed, or incorporated into the new guidelines.

All that being said, we have respect for the members of the expert panel and believe they will do their best to meet the mission they have been tasked with. We do have some thoughts about the process behind the creation of the guidelines, however.

First, you have set an aggressive timetable for the expert panel, which we applaud. We urge you to do your best to make sure that the deadline is met. In the worst case, we would hope you would lift the pause should the expert panel need more time, and move forward with the 2022 DCR Forest Management Projects and projects planned by DWSP.



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As you know, we have suggested that the expert panel use the paused 2022 forest management projects as case studies and concrete plans that can be examined for compliance with and inform development of the new guidelines. We proposed this because we don't want to see a one-year pause become an 18-month pause because DCR must re-write all forest management projects before proceeding. Everyone we have talked to about this idea – at EEA, DCR, and elsewhere – has told us it is an innovative and smart idea. We hope you will implement it, and those paused projects will be ready to be put out to bid promptly at the expiration of the pause.

We are concerned about placing an overwhelming focus on forest carbon to the exclusion of all other ecosystem services. You have indicated that the guidelines will not ban wildlife habitat creation and DWSP's water quality protection work, and we hope that is true. Many forest ecologists and scientists believe that we should really be managing for resilience and not carbon, since so much forest carbon is at risk given the many health challenges facing our forests. We urge you to protect the important work MassWildlife and DWSP are doing on their lands during this process, and continue work to improve forest resilience.

We've also expressed concerns about the new guidelines having unanticipated real-world effects. With no timber harvesters chosen for the panel, we are worried that the guidelines could accidentally make projects uneconomical for harvesters. If this happens, DCR, MassWildlife, and DWSP could put projects out to bid, only to find no bidders. This has already happened in a few cases for previous DCR forest management projects.

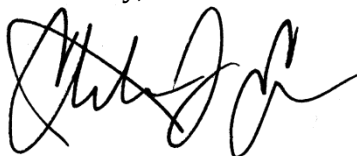
We've seen that the Family Forest Carbon Program, run by The Nature Conservancy and the American Forest Foundation, is right on the edge of profitability for mechanized harvesters with its maximum limit of 15% of basal area allowed to be harvested. It's quite possible that your climate-oriented guidelines could encounter the same issue, and the only way to know if they will is to listen to harvesters.

While we plan to submit comments after seeing draft guidelines in November, we hope you'll look to incorporate feedback from harvesters and others before that time. We are at your service in this respect, happy to connect you with our members to receive their valuable feedback.

Should you have any follow-up questions or would like to meet with us to explore these issues in greater depth, please let me know. I can be reached at (617) 645-1191 or [cegan@massforestalliance.org](mailto:cegan@massforestalliance.org).

Thank you again for the opportunity to share our perspective.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Egan', with a stylized, flowing script.

Christopher Egan  
Executive Director