September 11, 2023

Melissa Hoffer, Climate Chief

Office of Climate Innovation and Resilience

Executive Office of Energy and Environmental Affairs

100 Cambridge Street, 10th Floor

Boston, MA 02114

**Dear Melissa,**

The Massachusetts State Chapter of the National Wild Turkey Federation (NWTF-MA) appreciates the opportunity to provide comments to inform the development of forest management guidelines for state lands and other forest landowners. The NWTF is a national conservation organization with over 1,000 members in Massachusetts. Since our formation 50 years ago, we have created, enhanced or restored over 20 million acres of habitat nationwide.

Massachusetts’ forests are a tremendous natural resource that provide numerous important benefits and services, not the least of which is the ability to offset carbon emissions, and help the Bay state reach net zero greenhouse gas emissions by 2050. But how we get there matters, and to help ensure that our forests are healthy and provide the suite of products and services we need and expect, we offer the following comments for consideration:

* State and private forestlands should be managed for a variety of benefits and services, including carbon storage and sequestration, clean water, wildlife habitat, and wood products. While these objectives are not necessarily mutually exclusive, we should not prioritize one benefit/service (i.e. carbon storage/sequestration) over all others, especially on state forests and wildlife management areas. Instead, we should prioritize desired future forest conditions that provide for a healthy, resilient, and adaptable forest that can withstand an uncertain climate future.
* Active forest management can increase forest health and resilience by increasing species composition and age class and structural diversity. In turn, resilient forests are better able to withstand disturbance events that would otherwise result in large-scale carbon emissions. While active management may temporarily reduce carbon stocks in a forest, the long-term benefits to carbon storage and sequestration are outweighed by any small-scale, short-term emissions associated with management activities. Without active management, the ability of forests to sequester carbon will decline through time, and forest stands that were once carbon sinks may even become carbon sources as the frequency and intensity of forest disturbances increase.
* With respect to both forest management guidelines and forest reserve criteria, we advocate that maximum flexibility be provided to state land managers to allow them to adapt and respond to future uncertainties and threats, such as changing climate conditions, invasive pests and plants, tree pathogens, etc. For instance, in just the last few years, multiple new invasive insects and diseases have been detected in the state, included breeding populations of spotted lanternfly, beech leaf disease, and elm zigzag sawfly. Combined with existing invasive species such as emerald ash borer, spongy moth and hemlock wooly adelgid, these forces threaten to radically reshape the composition of our forests. While forest reserves can be an important tool to preserve natural communities and ecological processes, the increasing frequency and intensity of forest disturbances and stressors, may limit realized benefits in the absence of management.
* Climate smart forestry practices provide a suite of tools that allow both state land managers and private woodlot owners to manage the forest for carbon benefits, as well as, wildlife habitat and sustainable locally produced wood products. Our public lands are spaces where we can do the best forestry to rehabilitate degraded woodlands, provide habitat for threatened and rare species, and demonstrate the best silvicultural practices to educate landowners and foresters.

We greatly appreciate the hard work of the EEA and the Forest as Climate Solutions committee in working to conserve our forests for the benefit of the citizens of the Commonwealth. Thank for your time and consideration of our concerns regarding the development of forest management guidelines and the expansion of forest reserves. We look forward to participating in the public review process as this important effort progresses.

Yours in Conservation,

Keith Fritze

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NWTF State Chapter President, Massachusetts