

Comments to Climate oriented forest management guidelines
September 15, 2023
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Thank you for the opportunity to comment on Climate-Oriented Forest Management Guidelines

The single most important action needed for state-owned forested land is to do nothing. Stop all logging of state-owned forests. This proforestation approach will let the forests sustain themselves and, in the process, all of us.

In the short run, this has several elements. For whatever logging contracts are outstanding, if they cannot be paused and reassessed, all work should be done in an environmentally sensitive way. Take out only single trees, use chainsaws and horses for removal. If heavy equipment is needed, put down a temporary surface so that soils and streams are not disrupted. Clean and inspect all equipment to avoid bringing in invasive species and non-local organisms. Verify that the logged wood stays in Massachusetts.

In the next few decades, we need our forests to work for the planet, not solely for researchers, loggers, hunters, fishers, birders or exclusively Massachusetts residents. Trees work to generate oxygen, remove pollutants, provide cooling shade, moderate temperature extremes, stabilize the water cycle, emit healing aerosols, and create spaces for wildlife—especially native insects. The ecosystem they inhabit does at least as much underground, communicating information and sharing resources in a collaboration we would do well to mimic. Of special interest to us in the near term is a forest's proven ability to pull carbon from the atmosphere and, if undisturbed, hold it securely in the wood and in the soil.

There are many outdated assumptions that were brought into the discussion on September 12, 2023:

- If forests aren't working, they will be converted to development. I hope that Massachusetts is better able to protect its state-owned lands than this assumes!
- To be healthy, forests require human intervention. This is the kind of anthropocentric thinking that got us into this mess of climate change and biodiversity decline.
- Mature forests don't sequester as much carbon or supply as much species diversity as young trees do. This has been disproven by recent research.
- Thinning and patch clearing are good for forest ecology in the name of creating early successional habitat. In fact, the more edges and openings that are created, the more invitation there is for non-native plants to invade and the less ability the forest has to cool itself and reduce wind and wildfire damage.
- Areas conserved in the past for hunting and fishing activity should continue to be managed for this use. While those efforts helped to protect land from development, efforts to support game species do not improve conditions for native wildlife that were here before colonization, including birds like the chickadee that will be ushered out by a warming climate.
- The original inhabitants of the northeast used fire to clear areas. This has been contradicted by recent examination of soil cores. Even if it were done occasionally, our local tribal migrants would have done this on a small scale, not as a multi-acre, multi-site practice.

One of the thorniest issues raised about forest management is the lack of data and transparency. The general public has no way to learn of projects until they are underway—even for abutting communities like the one near the Montague Plains. There is no dashboard of projects where residents can gain easy access to the goals, status, and results. Where there are ongoing “restoration” activities, there is no evidence of pre-project baseline studies, particularly as they relate to soil biology and composition. Carbon sequestration data supplied for climate accounting purposes have been disputed; critics fault the agencies for averaging to manipulate the outcome of carbon storage.

As some people have testified, we would do well to learn from indigenous approaches. They remind us that we have a relationship with the natural world—that those plants, animals, and the individuals in between are our relatives, to whom our first duty is respect and care. It is illegitimate to justify a commercial approach to the forest on the basis of a romanticized (and often homogenized) view of how native people lived.

Ideally Massachusetts would regard its state forests from the perspective of regional environmental considerations. Unlike other New England states, there are several large swathes of healthy, intact forest. These treasures need to be preserved to anchor wildlife corridors and seed banks for the future. This will be the source of climate resilience. Many of these sites are close enough to land trust- and municipally-preserved parcels to stitch them together in an ecosystem capable of absorbing a higher water table and holding moisture through periodic droughts. Suburbs have created early succession habitats throughout Massachusetts, offering space for favorite songbirds. If more people adopt Doug Tallamy’s challenge of turning their lots into “home-grown national parks,” these will provide additional buffers to benefit from, and support, biodiversity.

The statement submitted by the Sierra Club Massachusetts Forest Protection team includes many of the studies that form the basis of this testimony.

Respectfully,

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