

From: [Glen Ayers](#)
To: [MEPA-regs \(EEA\)](#)
Subject: Changes to MEPA regs related to forests and reaching Net-Zero by 2050
Date: Monday, September 16, 2024 6:55:05 PM

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Dear MEPA-regs,

Please consider and incorporate the following suggestions into your draft revision to the MEPA regs:

1. Please close the MEPA logging loophole that allows logging on state-owned lands to completely avoid any meaningful analysis and disclosure of climate and environmental impacts by exploiting the loophole (threshold) that as long as the "project" is following and "approved cutting plan or other similar generally accepted forestry practices" then the whole thing is exempt from MEPA, no matter how many acres, how much potential damage, or how much controversy the project generates. This loophole is outrageous, and so vague as to be meaningless. Forest Cutting Plans are mostly a cut-and-paste job with 90% boilerplate garbage and double-speak. They are written by loggers for loggers. The plans rely on voluntary "Best Management Practices" (BMP) which are only suggestions. The BMPs are outdated, have nothing to do with protecting the climate or biodiversity, and are just suggestions that are for the most part fluff and window dressing.

2. Please amend the MEPA regs so that the development of forest management plans, timber sale plans, forest stewardship plans, or other efforts to manage timber resources occurring on state-owned lands under the control of DCR, require that such plans shall be developed in strict accordance with [Section 2f of Chapter 21](#), and all such plans shall be published in the Environmental Monitor and submitted to the Stewardship Council for approval as provided by said section. All comprehensive forest resource planning efforts shall be done so as to consider the cumulative impacts of similar projects on state-owned lands occurring over a 10-year planning horizon, and shall be subject to full disclosure of climate impacts as specified in [Section 61 of Chapter 30](#). Cumulative impact analyses shall also consider similar management activities being conducted on private lands which may be adjacent to those state-owned lands where planning for active management is being considered. Within one year of passage, the Commissioner shall enact regulations specific to the agency's vegetation management efforts occurring in public forests, parks, and watershed protection areas, consistent with the above, and in accordance with [Chapter 30A](#). Such regulations shall include a provision for citizen appeal of final decisions and shall specify the process for disposition of such appeals.

Thanks for listening and incorporating these suggestions into the revised MEPA regs.

Sincerely,

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