September 19, 2024

Secretary Rebecca Tepper

Executive Office of Energy and Environmental Affairs

100 Cambridge St., 10th Floor  
Boston, MA 02114

Dear Secretary Tepper,

We respectfully submit these comments regarding the drafting of Biodiversity Goals for the Commonwealth. We applaud Governor Healey for signing Executive Order No. 618 directing the Department of Fish & Game to develop biodiversity conservation goals for 2030, 2040, and 2050. We agree with the general approach of protecting, restoring, and sustaining species, habitats, and ecosystems and connecting all people to nature. As the Department of Conservation and Recreation owns and manages more acres than any other state agency and connects people to nature all across the Commonwealth, we expect DCR to be a central player in advancing these goals.

As an overarching statement, we strongly agree that **preserving biodiversity is a climate solution**. Loss of biodiversity and climate change are interrelated crises that must be solved together. Land conservation, restoration and stewardship strategies must seek to optimize our abilities to mitigate and adapt to climate change as well as maintain and increase biodiversity.

**Protect**

* We applaud the goals of protecting 30% of Massachusetts land and waters by 2030 and 40% by 2050. The 2050 goal must be seen as a minimum.
* DCR must be adequately funded and staffed to accelerate its pace of land conservation for biodiversity and for recreation.
* DCR’s land conservation strategy should prioritize biodiversity conservation, focusing particularly on unprotected BioMap Core and Critical Natural Landscape areas adjacent to existing state-owned land.
* DCR should continue to work with NGO partners to identify, fund and complete high impact land conservation projects.
* EEA should develop mechanisms to measure progress against each of the biodiversity goals. Specifically, EEA should upgrade the process for updating and maintaining GIS data on currently protected open space to ensure accurate metrics for this goal and to assist with land conservation planning.

**Restore**

* DCR and MassDOT should work closely together to become leaders in wildlife-friendly transportation planning. DCR parkways should be managed with wildlife in mind, particularly sensitive species directly affected by vehicle traffic. Parkways should be used to demonstrate effective wildlife passages including underpasses and overpasses.
* EEA should continue to direct DEP to update regulations to enable wetlands restoration at the pace and scale necessary to respond to the threats of climate change, particularly in salt marshes and other coastal habitats.
* DCR’s Office of Dam Safety and the Division of Ecological Restoration must enhance partnership to accelerate the pace of dam removal. State agencies should develop a coherent community outreach and support service to answer the common set of questions that arise when a community is considering dam removal.

**Sustain**

* We continue to believe that carefully planned forest management can enhance biodiversity, support local communities, and help our forests adapt to future climate conditions. We agree with EEA’s *Response to the Report of the Climate Forestry Committee* that “[r]ecognizing the carbon sequestration and storage implications, when necessary to meet habitat goals the Commonwealth will manage land to sustain biodiversity for at-risk species and Species of Greatest Conservation Need in selectively sited ecological landscapes.”
* MassWildlife must develop and apply adequate methods to actively monitor and maintain white-tailed deer density at appropriate levels for forest health. The Hunters Share the Harvest program is admirable and should be expanded and supplemented with additional methods to reduce WTD density to current Wildlife Management Zone goals.

**Connect**

* DCR should be funded to increase nature-based education and outreach programs for all ages. All programs should have some biodiversity component, leveraging local stories to emphasize the importance of biodiversity.
* Recreation facilities must be sited and activities managed to avoid areas most valuable for biodiversity.
* DCR should partner with communities to create one or more Dark Sky Preserves centered on state parks characterized by low light pollution. Dark sky efforts are critical to biodiversity, stargazing programs are a great way to connect people to nature, and designated preserves can generate tourism activity in rural areas.

The entire Stewardship Council looks forward to working with Commissioner Arrigo and the talented DCR staff to advance their biodiversity goals.

Sincerely,

The DCR Stewardship Council

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