

October 11, 2019

The Honorable Anne Gobi
Joint Committee on Environment,
Natural Resources and Agriculture
State House, Room 513
Boston, MA, 02133

The Honorable William Pignatelli
Joint Committee on Environment,
Natural Resources and Agriculture
State House, Room 473F
Boston, MA, 02133

Re: Massachusetts H.897, An Act Relative to Forest Protection

Dear Chair Gobi, Chair Pignatelli, and members of the Joint Committee on Environment, Natural Resources, and Agriculture,

On behalf of our organizations, we appreciate the opportunity to offer testimony on H.897, *An Act Relative to Forest Protection* (sponsored by Representative Susannah Whipps). We write to share our concerns about the bill and respectfully request that the legislation be further studied by the Committee.

Climate change is a real threat. Storms are getting stronger and more destructive, droughts longer and more devastating, and our organizations are all working on ways to adapt, prepare, and minimize this great threat to our natural resources and the life of our planet. We all need to reduce emissions to avoid the most catastrophic effects of climate change, and the Commonwealth has been a leader among US states in committing to significant economy-wide emissions reduction goals. However, that alone is not enough; we also need to wisely protect and manage our natural resources to draw carbon pollution from the air, especially the Commonwealth's critically important forests. As we have this conversation, it is important to remember that while forest carbon, including in wood products, is an important value of forests, it is not the only one for which our state lands have been protected and are managed.

H.897 would require that all Department of Conservation and Recreation (DCR) Division of State Parks and Recreation, DCR Division of Water Supply and Protection, and Department of Fish and Game Division of Fisheries and Wildlife (MassWildlife) lands be preserved in a natural state, with no timber sold, removed, or destroyed. We agree that forest reserves (forests managed by natural processes) are a critical component of our forest landscape, and most of us are working to expand forest reserves on our lands. However, we do not think the best way to maximize the contribution of forests to addressing climate change is to prohibit timber harvest on all state lands and convert them all to reserves or parklands.

Agencies are statutorily required to manage their land for a multiplicity of benefits. The 'one-size-fits-all' approach in H.897 would inhibit the ability of these agencies to use diverse management approaches to steward their lands for a balance of values, including wildlife habitat, recreation, water provisioning, rural economies, and climate change mitigation and adaptation.

Current state forest management

Current state law requires state agencies to consider a range of values, including but not limited to carbon and climate resilience, when they make forest management decisions. Our organizations believe the legislature should continue to set the framework that authorizes and directs agencies to use science-based decision-making, in consultation from stakeholders and experts. Below are some examples of state agency management guidance for forest lands.

DCR's 2012 report, *Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines*, which was the conclusion of a multi-year, stakeholder-driven process, including several of our

organizations, calls for a balance of state lands as woodlands, reserves, and parklands.¹ Today, about 60% of DCR's over 300,000 acres of state parks and forests are categorized as reserves or parklands, with no commercial timber harvest. When harvesting is proposed in forest reserves for public safety or ecological restoration, it is first reviewed and approved by the *Forest Reserve Science Advisory Committee*. DCR also owns and manages a number of plantations and fire-dependent forests, which cross the reserve, parkland, and woodland designations. These forests are some of the examples of places where timber harvesting increases carbon storage and sequestration compared to leaving the forest alone.

DCR's Division of Water Supply Protection (DWSP) manages another 101,000 acres for public water supply. It is critical that these forests remain resilient to storms, diseases, and pests, which can be best achieved by maintaining diverse forest stands to contain multiple species of diverse age classes. The Division of Water Supply Protection Science and Technical Advisory Committee's 2012 study of the Quabbin, Ware, and Wachusett watersheds, which provide water for more than two million people, concluded that:

"Active management of DWSP forest land to increase the diversity of heights, ages, and species in what is currently a predominantly even-aged forest is a reasonable and prudent way to prepare for and minimize the adverse effects of natural and anthropogenic disturbance on streamflow and water quality.... A diversity of heights, ages, and species maximizes the resistance and resilience of the forest in relation to hurricanes, tropical storms, insects, and diseases. It also is a buffer against the uncertainty associated with global climate change..."²

Finally, MassWildlife manages 168,000 acres of Wildlife Management Areas (WMA) for a range of diverse species, of which 20,000 acres are currently designated reserves. In order to support these species, MassWildlife has developed a goal for WMA landscape composition: about 20-25% open habitats (including grassland, shrubland, and young forest sites) and 75-80% full canopy forest (including 10-15% forest reserves).³ As stated in the Massachusetts Wildlife Action Plan, "In many cases, achieving habitat goals involves actively manipulating existing features because the desired future condition is different than the present condition."³

In addition to affecting management of state lands, H.897 would impact state programs that assist private landowners with forest management, by removing the ability of state agencies to model best forestry practices and techniques for private landowners. In the long run, as state agencies lose a small but important source of revenue from timber sales, H.897 would likely reduce the funding available for the successful outreach and stewardship programs that encourage and incentivize private landowners, who own about 80% of the Commonwealth's forests,⁴ to follow best management practices and to consider climate change in their forest management plans and practices.

Carbon and forest products

Forests are more than the carbon contained within them. However, even if looking solely at carbon, it is important to consider both the carbon on the land and the carbon in harvested wood products. While any harvest results in tradeoffs, including at least a small decrease in carbon stocking in the near term, with careful

¹ Massachusetts Department of Conservation and Recreation. 2012. Landscape Designations for DCR Parks & Forests: Selection Criteria and Management Guidelines. Available online at: <https://www.mass.gov/files/documents/2016/08/qq/management-guidelines.pdf>

² Barten, P.K., et al. 2012. Review of the Massachusetts DWSP Watershed Forestry Program, DWSP Science and Technical Advisory Committee. Available online at: <https://www.mass.gov/files/documents/2017/10/02/review-of-mass-dwsp-watershed-forestry-progarm.pdf>

³ Massachusetts Division of Fisheries and Wildlife. 2015. Massachusetts State Wildlife Action Plan 2015. Westborough, MA. Available online at: <https://www.mass.gov/service-details/state-wildlife-action-plan-swap>

⁴ University of Massachusetts Amherst. 2019. "Massachusetts Forests". Accessed online on September 27, 2019: <https://masswoods.org/massachusetts-forests>

planning and management most forests can produce wood products while also increasing the carbon stored in the forest over time.

Locally harvested wood can replace building materials that have a larger carbon footprint, like steel and concrete, thereby reducing carbon emissions. According to MassWildlife, about 50% of the sawtimber harvested from MassWildlife lands goes into finished wood products (furniture, flooring, structural timbers, etc.) that lock up carbon for decades or even longer.⁵ There are also new opportunities to use cross-laminated timbers, glulam, and other engineered wood products for construction of wood-based buildings approaching 20 stories in height. The total carbon cost of these new wood buildings can be substantially less than similar buildings built of steel and/or concrete.

Only 2-5% of paper and wood products used in Massachusetts are grown in the Commonwealth.⁶ Locally sourced timber, like locally sourced food, has a smaller carbon footprint in part because of reduced carbon emissions from transportation. As Harvard Forest's "Illusion of Preservation"⁷ detailed many years ago, Massachusetts is a net importer of wood, and preventing the cutting of trees on state land here likely means that our wood will come from other regions or other countries, including many places with fewer environmental safeguards and more negative carbon impacts. In addition, local timber is important for supporting Massachusetts' local natural resource-based economies.

Conclusion

We support a science-based management strategy for Massachusetts forests that acknowledges the range of ecosystem services, including carbon, that they provide. **At this point, the greatest immediate threat to our Massachusetts forests are the more than one million acres of lands prioritized for conservation that have no legal protection and are therefore at risk of development.** If the legislature seeks to increase and protect forest carbon, we respectfully suggest that they consider other mechanisms, such as enhanced funding for state agencies and land conservation programs, supporting an increase to the Conservation Land Tax Credit (H.2522/S.1767), and enacting An Act to Sustain Natural and Working Lands Carbon in Communities (H.842/S.2014), to address this challenge. The legislature can also consider how to continue the Commonwealth's leadership on using local wood in local buildings, such as the visitor's center at Walden Pond State Park and the John W. Olver Design Building at UMass-Amherst.

Bill H.897 has opened a fruitful conversation about how management of our Massachusetts state lands can best impact climate change. However, the one-size-fits-all approach to land management is not the best approach to maximize our forests' multiple values or to significantly increase carbon. We respectfully request that H.897 be studied by the committee until we can ensure that forest management balances carbon sequestration with the numerous other values our forests provide.

Thank you for your consideration.

⁵ MassWildlife. 2019. "Carbon storage on MassWildlife lands." Accessed online on September 20, 2019: <https://www.mass.gov/service-details/carbon-storage-on-masswildlife-lands>

⁶ University of Massachusetts Amherst. 2019. "Massachusetts Forests". Accessed online on September 27, 2019: <https://masswoods.org/massachusetts-forests>

⁷ Berlik, Mary M., Kittredge, David B., and Foster, David R. 2002. The illusion of preservation: a global environmental argument for the local production of natural resources. Harvard Forest Paper No. 26. Available online at: <https://harvardforest.fas.harvard.edu/sites/harvardforest.fas.harvard.edu/files/publications/pdfs/HFPaper26.pdf>

Sincerely,

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Lisa Vernegaard
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Sudbury Valley Trustees

Steve Long
Director of Government Relations
The Nature Conservancy in Massachusetts

Linda Orel
Policy Director
The Trustees of Reservations

Enclosed: 2019 Forest Forum statement: Valuing our Forests in a Changing Climate
Forests: a Natural Solution to Climate Change