December 10, 2021

Senator Rebecca L. Rausch, Co-Chair
Joint Committee on Environment, Natural Resources and Agriculture
State House, Room 218
Boston, MA 02133

Representative Carolyn C. Dykema
Joint Committee on Environment, Natural Resources and Agriculture
State House, Room 473F
Boston, MA 02133

Via Email:  JointCommittee.Environment@malegislature.gov


Dear Chair Raush, Chair Dykema, and Members of the Committee:

On behalf of Mass Audubon’s 135,000 members who reside in every town and city across the Commonwealth, I am grateful for the opportunity to submit testimony in support of bills to create old growth forest reserves on state lands and. Mass Audubon also supports some of the concepts proposed in H. 912 and H.1002 regarding management of state-owned forestlands, while suggesting amendments to ensure that these lands can be managed with the best available science.

The Commonwealth of Massachusetts, the Department of Conservation and Recreation (DCR) and Division of Fisheries and Wildlife (DFW), is the largest landowners in the state, with stewardship responsibilities across hundreds of thousands of acres of land including dozens of different natural community types and habitat for hundreds of state-listed rare plant and animal species.

Forests and other natural and working lands provide many ecosystem services including carbon storage and sequestration, climate mitigation and resilience, clean air and water, shading and cooling, prevention of flooding, recreation, and habitat for fish and wildlife. These values are becoming ever more important in light of climate change, increasing demand for outdoor recreation and associated public health benefits, and the ongoing loss and fragmentation of forests on private lands due to development.

Scientifically-sound management of the DCR and DFW lands, with transparency and public input, is important to support a host of public interests associated with the ecosystem services they provide.

Forest reserves are one essential component of public lands stewardship. H. 856 and S.557 would create permanent Old-Growth Forest Reserves in and around the small areas of Massachusetts where forests
have survived undisturbed by human activity. Old growth forests are extremely rare – in 5 million acres of land in Massachusetts, only 1,500 acres are old growth forest. Old growth is scattered throughout the state in small patches - mainly on steep mountainsides in Western Massachusetts, mostly on DCR land. These areas serve as living laboratories to learn about forest development, tree genetics, and climate change. Canopy layers and fallen trees create rich and diverse habitats for many species of birds, insects, and reptiles. Old growth forests act as carbon sinks to sequester greenhouse gases.

Old growth forests in Massachusetts are not currently protected, except through administrative policies that could change at any time. These bills would:

- Prohibit new development, recreational facilities, and commercial timber cutting in old growth forests.
- Create a research and education program to monitor the status and promote understanding of old growth forest reserves.
- Assess and select forest areas which could one day meet the definition of an old growth forest to help ensure their long-term protection.

Mass Audubon supports H. 856 and S.557, and we recommend that the Legislature go further and provide a framework for designation of larger areas of intact, connected forest cores across the state to be managed as reserves, influenced primarily by natural processes. Possible expansion of existing administratively designated forest reserves on state lands, and codification of those designations to ensure long term continuity, should be considered. We also support scientifically-sound management plans for all state lands, with public input that takes into account the full range of public interests in these lands.

The DCR Landscape Designations process is a good model to build upon. These designations established reserves where natural forest processes can proceed unimpeded, parklands managed to provide a range of recreational opportunities while also protecting important natural and cultural assets, and woodlands managed under forestry guidelines designed to protect the many values inherit in these lands. These designations resulted in more than 60% of the DCR lands being placed in reserves or parklands. However, these designations are an administrative construct only, and could be altered or reversed at any time. We recommend that the Legislature consider adopting a law that would formalize such designations and make the reserves permanent, with limited exceptions based on science and compelling public interests such as health and safety. DFW also develops science-based management plans for its lands, including reserves. DFW’s mission is to protect and steward land for wildlife habitat and wildlife-based recreation. Their management plans are based on an extensive State Wildlife Action Plan as well as site-specific information and the expertise of the many scientists on their staff. It would be beneficial for the Legislature to codify these planning processes and provide for periodic updates with public input, possibly through modified versions of H. 912 and H.1002.

Thank you for the opportunity to comment.

Sincerely,

E. Heidi Ricci
Director of Policy and Advocacy

2 https://www.mass.gov/doc/landscape-designations
3 https://www.mass.gov/service-details/state-wildlife-action-plan-swap