

December 4, 2021

**Massachusetts Joint Committee on Environment, Natural Resources & Agriculture**  
**Sen. Rebecca Rausch, Senate Chair**  
**Rep. Carolyn Dykema, House Chair**

**RE: Joint ENRA Hearing – Forestry, Funding & Administrative Infrastructure – December 7, 2021**

To Chairs Rausch, Dykema and members of the Joint ENRA Committee:

Thank you for the opportunity to provide written comments on proposed forestry legislation being discussed at the Forestry, Funding and Administrative Infrastructure Hearing on December 7, 2021.

Established in 1961, the Ruffed Grouse Society (RGS) is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with the American Woodcock Society (established in 2014), RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices. Our mission is to unite conservationists around wildlife habitat and forest conservation.

We note the following proposed legislation:

**HB 912** – An act related to forest protection that would establish a Scientific Advisory Council to advise the Department of Environmental Management in their decision-making, and among other things, prohibit the sale of timber from public lands.

**HB 1002** – An act related to increased wildlife protection that would set aside 30% of wildlife management areas as natural reserves.

**SB 557 & 561** – Acts related to promoting and protecting old growth forests in the Commonwealth.

Comments:

The 2020 Massachusetts State Forest Action Plan (SFAP) is a collaborative road map for the conservation and stewardship of Massachusetts' 3.2 million acres of forestland. The first two of its ten stated goals are 1) to increase resistance and resilience of trees and forests to help mitigate and adapt to the effects of climate change and 2) to manage forest ecosystem health and diversity. These goals are intended to address the 2020 SFAP's four highlighted challenges and threats to the Commonwealth's forests which are; climate change, forest conversion, invasive pests and plants and disconnection between local wood production and consumption.

Additionally, the 2015 Massachusetts State Wildlife Action Plan highlights 570 plant and animal species designated as Species of Greatest Conservation Need (SGCN), underscores the importance of maintaining robust habitat diversity across the Commonwealth (24 critical habitat types) and specifically states that *proactive habitat securement and habitat restoration and management* are two of the six prioritized conservation actions.

When stewarded appropriately, Massachusetts' forests can not only achieve the Commonwealth's climate goals, but simultaneously provide an entire suite of resiliency dividends like clean water, wildlife habitat, recreation, open space, renewable forest products and thriving communities. Achieving the 2020 SFAP & SWAP goals in the face of uncertain threats like climate change and invasive species requires an agile, adaptative stewardship approach that is responsive on a community and local level to changing & dynamic forest conditions.

Massachusetts Department of Fisheries & Wildlife (DFW) and Department of Conservation and Recreation (DCR) are actively engaged in a range of planning tools and management programs that work toward these State Forest Action Plan and State Wildlife Action Plans' goals which ultimately can support long-term forest resiliency across the Commonwealth in the wake of unprecedented risks. Proposed legislation like HB 912, HB 1002 and SB 557 & 561 are mandates that unnecessarily restrict DFW and DCR's ability to address these forest resiliency risks on a local and regional level. Further, we consider much of this to be duplicative to many of the processes and committee structures already in place by these agencies and their partners & stakeholders. HB 912's prohibition of timber sales on MA public lands will severely impair DFW and DCR's ability to achieve the SFAP and SWAP goals set forth collaboratively by a wide range of stakeholders. HB 1002's mandate of broadly setting aside 30% of WMA's as natural reserves might inadvertently diminish stewardship efforts that might be needed to address future conditions. While we support efforts that work with partners to create age-diverse and structurally resilient forest landscapes, stewardship objectives relating to landscape-level, forest age diversity targets, and the importance of including biologically mature forest conditions are complex and will need time to work through – we believe this would be best handled by working through DFW and DCR frameworks and their partners rather than through legislative mandates.

**Ruffed Grouse Society and American Woodcock Society would be opposed to HB 912, HB 1002, and SB 561 & 557 if they were to move out of the ENRA Committee.**

It's also worthy to note that forest stewardship and decision-making on Massachusetts' public lands impact outcomes and conditions on neighboring private lands. According to the 2018 *U.S. Forest Service's National Woodland Owners' Survey*, there are 39,000 family ownerships in Massachusetts (10+ acres and up) that steward 884,000 acres of forestlands. 90% of these owners surveyed noted that "nature and biological diversity" are either very important, important, or moderately important, while 85% responded similarly when asked about wildlife. Massachusetts' citizens and voters care very deeply about wildlife and the habitat diversity and sustainable forest management, and habitat work that's needed to sustain this public resource. RGS and AWS encourages ENRA to support additional funding and staffing opportunities for DFW and DCR's wildlife habitat and sustainable forest management programs so they can continue their work toward achieving the goals outlined in the MA SFAP and SWAP.

Respectfully submitted,

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