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Peter Church

Director, Forest Stewardship
DCR Bureau of Forest Fire Control and Forestry
251 Causeway Street
Suite 900
Boston, MA 02114

Re: Massachusetts DCR Public Comments on Forest Management Programs 2022 proposals in Washington, Cummington, Warwick, Savoy, Otis, Sandisfield, Townsend, Carver, and Edgartown.

To Director Church,

Thank you for offering Ruffed Grouse Society & American Woodcock Society the opportunity to comment on Massachusetts' DCR proposal for upcoming state forest management programs across nine towns in the Commonwealth, as outlined in your virtual public meetings on October 18 & 20, 2022. 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.

RGS & AWS strongly supports DCR's forestry program recommendations, and we applaud the agency's efforts to advance sustainable forest management across the Commonwealth. The Massachusetts 2020 Forest Action Plan ([link here](#)) identifies 10 broad goals for Massachusetts' forests, including "increasing resistance and resilience of trees and forests to mitigate and adapt to the effects of climate change, and managing for forest ecosystem health and biodiversity". There are 570 Species of Greatest Conservation Need in the Massachusetts State Wildlife Action Plan and the loss of habitat and forest age class diversity is one of the leading factors <https://www.mass.gov/service-details/state-wildlife-action-plan-swap>. This issue is attributed in large part to wide-ranging habitat decline and a lack of forest habitat diversity. The forestry programs that are being proposed will help address these challenges.

Balanced, resilient forests provide whole ecosystem benefits, including clean air & water, recreation, open space, and abundant wildlife habitat. There is a link between forest age class diversity loss and wildlife declines. Forest habitat diversity was historically maintained by natural disturbances - which have largely been suppressed in New England for over a century. Sustainable forestry emulates natural forest

disturbances to create a much-needed balance of tree ages, species, and habitat types that are good for wildlife and ecosystem resiliency.

Additionally, the proposed DCR forest management programs are consistent with the ten forest climate adaptation strategies recommended by Swantson et al (2016) [Forest Adaptation Resources: climate change tools and approaches for land managers, 2nd edition](#) (Northern Research Station General Technical Report NRS-87-2) which include for example sustaining fundamental ecological functions, reducing the impact of biological stressors, maintain and enhance species structural diversity, promote landscape connectivity, and increase ecosystem redundancy across the landscape.

A concerted effort is needed to ensure resilient, climate-adapted, diverse forest landscapes throughout Massachusetts. **Sustainable forest management is entirely compatible with climate solutions and services like mitigation, adaptation, and biodiversity.** We applaud DCR's efforts to incorporate sustainable forestry and wildlife friendly silvicultural practices into your planning frameworks.

Respectfully,

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For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.