

MASSACHUSETTS FOREST ALLIANCE

249 Lakeside Avenue, Marlborough Massachusetts 01752-4503
www.MassForestAlliance.org | (617) 455 - 9918 | info@MassForestAlliance.org

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Christopher French
Deputy Chief, National Forest System
USDA Forest Service
1400 Independence Ave SW
Washington, DC 20250

Mr. French:

The Massachusetts Forest Alliance represents forest landowners, foresters, timber harvesters, and forest products companies in Massachusetts. I'm writing with comments regarding the Forest Service's Request for Information on Federal Old-Growth and Mature Forests.

Here in Massachusetts, we don't have any national forests. However, decisions made related to national forests can have an important trickle-down effect on state forests and even private forestland in states like ours.

We're concerned about the executive order related to mature and old growth forests. We've seen anti-forestry activists seize on this executive order to try to ban forest management (including for wildfire risk reduction) in not only old growth forests, but mature forests as well. One organization, confusing us with an anti-forestry group with a similar name, told us, "Our long-term goal is to pressure the Biden Administration into creating a federal rule against any further logging of old growth forests and vulnerable maturing forests."

Others will try to leverage this federal step to try to force state agencies to adopt similar policies. They believe that the executive order confirms their mistaken belief that science says unequivocally that never cutting another tree again is better for climate change than careful, science-based forest management. Ruling out management means limiting the ability to bolster resilience and adaptation of forests, using such tools as assisted migration and others. We urge the Forest Service to continue to reinforce the science behind management decisions going forward.

Here in Massachusetts, there is little old growth forest. The small amount that remains – around 1,500 acres in total – is in no danger of being cut. In fact, when two of our members who own both significant forestland and sawmill businesses discovered what they believed to be patches of old growth forest on newly-acquired forestland, their reaction was not to cut those trees, but instead to permanently protect them. No one in Massachusetts wants to cut the old growth forest we have left.

Advocating for a Strong, Sustainable Forest Economy



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In terms of creating a single definition encompassing both mature forests and old growth across the entire country, we don't believe such a thing is possible, given the broad diversity of tree species, climate, and other influencing factors across the nation. You would likely end up with a definition so vague and general as to be meaningless – and would require inventorying the vast majority of national forestland, making it of little practical use. We oppose attempting to create a single definition.

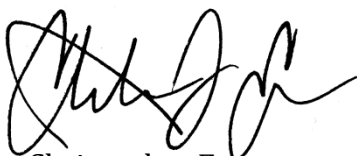
Using a single definition reinforces the mistaken belief that old growth and mature forests are the exact same thing, just at different ages, when in fact past disturbance histories, species and age class composition, and other factors show clear differences. The definition of old growth (at least here in Massachusetts) usually involves a lack of evidence of post-European settlement human disturbance, such as stumps, stone walls, roads, etc. For mature forests (the majority of trees in Massachusetts forests are between 70 and 120 years of age), a history of human disturbance is typically plainly evident.

Just defining mature forests themselves can be a challenge – are we talking about financial maturity, which differs depending on the tree species and the forest product desired? Biological maturity, which again differs widely, depending on tree species and location? An accurate measure of maturity might need to factor in vulnerability to weather events and catastrophic fires, which are plaguing our forests and in some cases are resulting in failed regeneration – meaning a permanent loss of forestland.

Instead of attempting to create a single definition, we would encourage you to create two different definitions – one for mature forests, and one for old growth – that recognize the significant differences (in management, disturbance history, resilience, carbon storage and carbon sequestration rates, and more) between the two. It should still be possible to inventory both categories with two different definitions, and we're uncertain why a single definition is necessary.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Egan", written in a cursive style.

Christopher Egan
Executive Director