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**Massachusetts Sierra Club**

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May 22, 2013

Chairwoman Anne M. Gobi  
Joint Committee on Environment, Natural Resources and Agriculture  
State House, Room 473F, Boston, MA 02133

Chairman Marc R. Pacheco  
Joint Committee on Environment, Natural Resources and Agriculture  
State House, Room 312B, Boston, MA 02133

**Re: Massachusetts Sierra Club Testimony Supporting H.749,  
An Act Authorizing the Establishment of Old Growth Forest Reserves**

Dear Chairwoman Gobi, Chairman Pacheco, and Honorable Members of the Committee:

Thank you for the opportunity to offer our comments on H.749, sponsored by Representative Kulik, which calls for preserving Massachusetts' remaining old growth forests. The Sierra Club strongly supports this legislation.

The Sierra Club is the oldest and largest non-profit and non-partisan environmental organization in the country, with a national membership of 1.4 million. Its chapter in Massachusetts has over 22,000 members throughout the state and a history of protecting the environment that spans more than forty years. We work to create healthy, vibrant communities through support of clean air and water; clean energy; recycling and waste-elimination; and the preservation of the Commonwealth's most treasured forests, parks and open spaces.

To better understand the need for the present bill, it is necessary to first consider the present status of old growth forests in the Commonwealth. Old growth forests are parcels of land that have been left largely undisturbed since the area's colonial period and are a link to the grandeur of the natural world. In Massachusetts they contain trees that are hundreds of years old, some of which are 100 to 150 feet high. A 2008 survey revealed approximately 2,742 acres of old growth forest on Massachusetts state lands.<sup>1</sup> In the Commonwealth as a whole, nearly all old growth occurs forests are found within the Northeastern Highlands ecoregion.<sup>2</sup> By comparison, the land area of the Commonwealth is about 5 million acres. Thus, Old Growth Forests represent only .05% of the state's land area, which illustrates their extraordinary rarity and value. It is also important to note that old growth forests are not all the same. The dominant tree species as well as the types of ecosystems that each patch old growth forest supports vary, making each patch unique.<sup>3</sup>

As one can imagine, logging and development has already destroyed most of the old growth forest that were once common in the state. Even though these exemplary gems of nature are found on state lands, the old growth stands lack statutory protection necessary to withstand inconsistent state agency management policies. For example, the Massachusetts Department of Conservation and Recreation permitted the destruction of 12 acres for a snowboard park beside the rare and biologically rich old-growth forest at Wachusett Mountain State Reservation several years ago - contrary to the agency's resource management plan for the forest.<sup>4</sup>

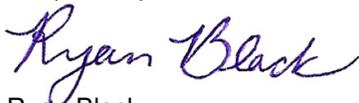
The Old Growth Forest Bill (H.749) would require the Secretary of Environmental Affairs to inventory forests on state lands, identify existing and potential old growth forest thereon based on well-defined criteria, and develop plans for the management and protection of the old growth forests. Most notably, a system of old growth forest reserves would be established on lands identified as containing old growth forest and include buffer areas around old growth forest groves in order to properly protect the forests from damage by human (e.g. development, harmful recreational activities, and timber operations) and natural (wind, storms, invasive insects) disturbances.

It is imperative that the Commonwealth of Massachusetts do everything it can to preserve remaining old growth forest on public lands for several reasons:

- Species diversity is substantially higher in old growth forests than secondary forests and therefore needs to be protected if Massachusetts is serious about protecting biodiversity.<sup>5</sup>
- Current old growth forests act as refuges for many organisms. These refuges are important sources of plants and animals for the colonization of present and future ecological restoration areas, which generally have lost most of their biodiversity.
- Old growth forests are important to preserve from a scientific perspective because they provide a window into the past. For example, using tree cores, ancient trees provide insight into past climate conditions, fire history and insect infestations.<sup>6</sup>
- Finally old growth forests have an intrinsic social worth, as some individuals believe that parts of the natural world should be left relatively undisturbed by people and take solace in knowing that this is the case.<sup>7</sup>

The Sierra Club fully supports H.749 and hopes that this bill receives a favorable review by the committee and the state legislature as a whole. We strongly believe that this bill is a crucial step in protecting old growth forests in Massachusetts for present and future generations of residents.

Respectfully,



Ryan Black  
Director  
Massachusetts Sierra Club

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<sup>1</sup> Mary Byrd Davis, *Old Growth in the East: A Survey* (Richmond, VT: Cenozoic Books, 1993).

<sup>2</sup> United States Environmental Protection Agency, "Ecoregions of Massachusetts, Connecticut, and Rhode Island," *The Encyclopedia of Earth* (2008) [http://www.eoearth.org/article/Ecoregions\\_of\\_Massachusetts,\\_Connecticut,\\_and\\_Rhode\\_Island\\_%28EPA%29](http://www.eoearth.org/article/Ecoregions_of_Massachusetts,_Connecticut,_and_Rhode_Island_%28EPA%29) (accessed Dec. 31, 2008).

<sup>3</sup> Anthony D' Amato, David A. Orwid, and Davis R. Forester, "New Estimates of Massachusetts Old-growth Forests Data useful for Regional Conservation and Forest Reserve Planning," *North Eastern Naturalist* 13, no. 4 (2006): 495-506.

<sup>4</sup> Sierra Club v. Commissioner of the Department of Environmental Management, SJC-08857, July 2003.

<sup>5</sup> Anthony D'Amato, David A. Orwid, and Davis R. Forester, "Understory Vegetation in Old-Growth and Second-Growth Tsuga Canadensis Forests in Western Massachusetts," *Forest Ecology and Management* 257, no. 3 (2009): 1043-1052; Sarah Cooper-Ellis, "Bryophytes in Old-Growth forests of Western Massachusetts" *Journal of the Torrey Botanical Society* 125, no. 2 (1998): 11-132.

<sup>6</sup> Department of Environmental Management Division of Forests and Parks, Bureau of Forestry, "Old Growth Policy," *Forestry*, <http://www.mass.gov/dcr/stewardship/forestry/docs/oldgrwpol.doc> (accessed May 22, 2013).

<sup>7</sup> *Ibid.*