

October 21, 2020

Governor's Council on Climate Change
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RE: Governor's Council on Climate Change Forests Sub-Group Draft Report

Representing thousands of Connecticut members who are hunter-conservationists, the below signed organizations commend Governor Ned Lamont for convening a Governor's Council on Climate Change (GC3), including a Forests Sub-Group under the Working and Natural Lands Working Group. Connecticut is both a densely populated and heavily forested state, with nearly sixty percent of its land base in forests (Hochholzer 2015). Forests in the U.S. offset around ten to thirty percent of the nation's annual CO₂ emissions (Houghton 2003), highlighting the opportunity Connecticut has to leverage forest management policy to offset its own carbon footprint. The diverse contributions of forests to protecting water and air quality, promoting biodiversity, and providing recreational opportunities and cultural values is well appreciated by Connecticut's outdoorsmen and outdoorswomen. In addition, Connecticut's 350,000 hunters and anglers annually spend an estimated \$752 million and generate \$90 million in state and local taxes in the state, and our community is a strong partner in forest stewardship. We appreciate the opportunity to provide input on the draft report, and wish to highlight a few concerns.

Our first concern is the process by which the report was developed, particularly the lack of inclusion of a number of varied stakeholders that should have been included in this process. Through our close work with the Bureau of Natural Resources within the Connecticut Department of Energy and Environmental Protection, we have a great appreciation for the important roles of your professional resource managers in considering diverse values and uses while researching, monitoring, and managing the state's fish, wildlife, forests, and other natural resources. As stakeholders with a history of directly partnering in these efforts, we are disappointed to have not been directly engaged in the process of developing this critical report. Direct representation of our community in the Forests Sub-Group would have been typical of the assistance we have provided in past planning efforts.

More specifically, the Governor's Council on Climate Change recommended that "DEEP should work with land trusts, forest owners, and *working lands managers* [emphasis added]..." There was, however, no representation on the Forest Sub-Group from private landowners, the DEEP Division of Forestry or the DEEP Division of Wildlife. The report discussed the management of state forests and wildlife management areas, nevertheless the "working lands managers" responsible for stewarding these lands, according to their statutory charters, were excluded from the Forest Sub-Group, though agency representation was included on the Agriculture/Soils Sub-Group and the Wetlands Sub-Group.

Additionally, it is particularly problematic that the report even acknowledges the contributions of sportsmen and women yet excluded them from the Forest Sub-Group. The report states that the "vast majority of funding to manage these lands (wildlife management areas), comes from the U.S. Fish and Wildlife Service Wildlife and Sport Fish Restoration Program." Indeed, sportsmen and women dollars generated through the "user-pays, public-benefits" American System of Conservation Funding supports the management of wildlife management areas, yet the agency responsible for administering these funds and managing these lands, was not consulted. Likewise, partner hunting-conservation nongovernmental organizations were not invited to the table.

We therefore strongly urge you to reconstitute the Forest Sub-Group to include representation from the forestry and wildlife communities, and we additionally urge you to extend the timeline to finalize the report to ensure that input from forestry and wildlife stakeholders is included in the report.

Regarding the substance of the report and looking past the aforementioned flawed process by which it was developed, we have serious concerns regarding the recommendation for establishing Core Forest Natural Area Preserves (CFNAPs) in Connecticut. The rationale cited for creating these areas is based on unsound science. “Proforestation” is an unproven concept not recognized by professional forestry and wildlife managers. We therefore present the following specific concerns regarding the recommendation for establishing CFNAPs and the associated rationale:

1. Exclusion of commercial harvests will promote uniform progression to late successional species in Connecticut forests that are vulnerable to invasive insect infestations and projected future increases in temperatures and drought occurrence – events that could increase tree mortality and convert carbon sinks to carbon sources. Counter to the opinion on benefits of passive management for carbon storage, careful management of forests can enhance resilience, particularly through facilitating adaptation to changing climate stresses, while also increasing carbon storage (Evans and Perschel 2009).
2. Significant Connecticut State Forest acres are already minimally managed, including dedicated research forests that explicitly provide their own permanent reserve areas paired as controls to managed forests. There is no need to establish CFNAPs entirely devoid of commercial harvests and salvage logging for the sole purpose to serve as control areas “to compare to the outcomes of management prescriptions” (p. 29). What would be more effective is additional collaboration to identify priority research questions and funding sources to support research and monitoring.
3. Though CFNAPs are claimed to be “a very low cost climate solution” (p. 29), the financial ramifications of losing a self-sustaining revenue source by removing lands from consideration for sustainable commercial forestry must be taken into consideration. Even where little management occurs, monitoring forest health, trespass issues, and potential timber theft and damage requires resources that would otherwise come at the burden of taxpayers.
4. Even with active management sustained on both public and private lands in Connecticut, nearly 10% of forest stands are 100 years of age or older, while less than 3% are under 20 years of age. The state’s forests are primarily maturing forests, with 78% of the trees being over 60 years old. Connecticut’s Forest Action Plan has identified this forest aging and progression to nearly 80% of stands in the sawtimber size class (over 11” diameter at breast height) as representing “potential detrimental effects for forest product sustainability, for protection against catastrophic weather or insect and disease outbreaks, and for wildlife species that depend on early successional habitats” (Hochholzer 2015, p. 13).
5. Although Connecticut has abundant upland forest habitats across the state, Connecticut’s Wildlife Action Plan (Terwilliger Consulting 2015) identifies maritime forests and young forests (those with seedling and sapling trees, generally 0 to 20 years of age) as the only sub-habitat types in poor condition. The secure future of a number of wildlife species of greatest conservation need depends upon suitable quantity and quality of young forest habitats, including several bellwether species for whom our organizations have served as important partners to help conserve on private and public forest lands in Connecticut, such as American woodcock (*Scolopax minor*), Eastern racer (*Coluber constrictor*), Eastern whip-poor-will (*Caprimulgus vociferus*), New England cottontail (*Sylvilagus transitionalis*), and ruffed grouse

(*Bonasa umbellus*). The lack of young forest in the state is a such a serious threat to wildlife that the DEEP Division of Wildlife partnered with other natural resource agencies and conservation organizations to develop Connecticut's Young Forest Habitat Initiative to address the loss of young forest habitat. The report does account for the dire need for diverse forest habitats to support Connecticut's diverse array of wildlife.

The report did not represent the consensus of the members of the Forest Sub-Group. We are aware of strong disagreement among the Forest Sub-Group members about the recommendations contained in the report, and to our knowledge, the report failed to disclose that Forest Sub-Group members held different opinions and did not support the report in its entirety. To be clear, we have serious reservations about the process by which the report was created and the substance of the report, but even if the process was corrected, we nonetheless disagree with the recommendations in the report and consequently recommend that the group be reconvened to expand the stakeholder group to ensure a better representation of stakeholders, especially forest owners and working lands managers, as the Council recommended.

Given the points above, we believe the lack of clearly incontrovertible carbon benefits does not warrant the negative long-term consequences for wildlife habitat and populations that could come from the draft report's recommended goal of establishing more than 100,000 acres of CFNPs, set aside from any management under commercial harvests and even salvage logging. To be clear, we would not suggest intentionally converting Connecticut's most mature stands to young forest habitat, as these stands also provide different but important wildlife habitat and other values, including higher volumes of carbon storage if properly sustained. We do support allowing professional foresters and wildlife managers to adapt to future impacts of catastrophic weather or insect and disease outbreaks on these stands, to apply forest treatments and create silvicultural conditions to benefit wildlife species that depend on early successional habitats, and to sustain multiple generations of forest stands for future benefits to Connecticut residents.

We commend your interest in exploring natural solutions to address carbon storage but encourage you to involve more affected stakeholders, particularly landowners, foresters, loggers, and wildlife managers, and consider the full range of programs and practices capable of offsetting the carbon footprint of Connecticut. Ensuring that forest lands remain economically productive through sustainable forest management is a proven carbon offset. If lands cannot be managed, their value decreases and the likelihood of forest conversion to development increases. Forest management practices sustain healthy forests and the habitats upon which many wildlife species and Connecticut hunters, anglers, and outdoorsmen and women depend. The undersigned organizations appreciate the opportunity to provide input and stand ready to assist you.

Signed,

American Woodcock Society
Congressional Sportsmen's Foundation
Connecticut State Chapter of National Wild Turkey Federation
National Deer Alliance
New England Chapter of Backcountry Hunters and Anglers
Quality Deer Management Association
Ruffed Grouse Society
Theodore Roosevelt Conservation Partnership
Wildlife Management Institute

SOURCES CITED

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