

2025 DSPR Forestry Proposals:

Summary of Public Comments and DSPR Responses

Overview:

On November 10, 2025, the Department of Conservation & Recreation (DCR) Division of State Parks and Recreation (DSPR) proposed ten forest management projects for public feedback for a 63-day period. Typically, the comment period runs for 45 days; however, an additional two weeks were provided due to the holiday season. DCR sought input on any or all of the proposed forest management proposals.

The feedback period closed on January 5, 2026, 29 comments were received through the online portal and direct email submissions, 11 comments addressed specific management proposals with the remainder more general in nature.

General Statement:

DSPR's approach to forest management is guided by a science-based, climate-informed framework that prioritizes long-term resilience, ecological integrity, and public safety. The program incorporates more than 60 years of vegetative data through CFI (Continuous Forest Inventory) plots throughout the state and has strengthened pre- and post-management monitoring to assess forest health, carbon dynamics, and biodiversity outcomes. In addition to CFI data, management decisions for specific projects are informed by the State Forest Action Plan, Land Designations (LD), and guidance from the Director of Forest Stewardship, helping ensure that projects align with statewide priorities, site-specific management objectives, and long-term stewardship goals. Climate considerations are integrated into project planning, with proposals outlining site-specific resilience objectives, risks, and adaptive strategies. Expanded monitoring of biodiversity and wildlife supports adaptive management and informs ongoing decision-making.

Management practices use a mix of active and passive approaches, including targeted treatments designed to create a mosaic of forest types and age classes to enhance structural diversity, habitat quality, watershed protection, and overall ecosystem resilience. These efforts are supported by enhanced interagency collaboration and climate-smart forestry tools developed in partnership with the Northern Institute of Applied Climate Science.

Public engagement remains central to DSPR's process, including formal comment periods and ongoing outreach. Project proposals are made public at a conceptual stage so that public input can inform key aspects, such as project layout and timing, before final decisions, including individual tree selections, are made. The Division continues to refine its approach through website enhancements that support greater public understanding, implementation of adaptive management practices, expanded monitoring, and climate-informed forest stewardship guided by the State Forest Action Plan and Land Designation Document.

In June 2023, the Commonwealth launched the Forests as Climate Solutions Initiative, which included a review of forest management practices on state lands stewarded by DCR's Division of Water Supply Protection, DCR's Division of State Parks and Recreation, and the Department of Fish and Game's Division of Fisheries and Wildlife. A primary goal of the review was to ensure that state forestry activities were informed by the latest climate science and reflected the importance of carbon sequestration and storage in concert with other agency goals. A Climate Forestry Committee was assembled consisting of 12 members with diverse backgrounds and expertise in climate science and forest land management to review current practices and make recommendations for future actions.

In January 2024, the Climate Forestry Committee issued the *Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines* (CFC Report), which provided recommendations regarding forest management on state-stewarded lands. In response, the Executive Office of Energy and Environmental Affairs released a comprehensive work plan, *Response to the Report of the Climate Forestry Committee* (Response), in June 2024 outlining how the three divisions, including DSPR, would pursue climate-informed forest conservation and management. The approach embraced by DSPR emphasizes a balanced combination of active and passive management techniques, prioritizes long-term carbon sequestration and storage, enhances biodiversity, and strengthens forest resilience to pests, disease, and climate-driven disturbances.

Based on the CFC Report and the Response, climate change considerations are incorporated into the internal review process for forestry proposals. These considerations require agency staff to be more specific and transparent about the relationship between climate objectives and active forest management. This information is included in the public descriptions of proposed forest management projects. The Divisions have also incorporated the CFC's recommendations by moving away from generalized references to "forest resilience" and instead clearly defining resilience within the context of each project. Forest management proposals now identify the specific forest functions or characteristics targeted for improvement, the primary stressors or vulnerabilities being addressed, and the mechanisms by which proposed management actions are expected to improve those conditions.

In conclusion, DSPR's approach to forest stewardship reflects the principles and priorities advanced through the Healey-Driscoll Administration's Forests as Climate Solutions Initiative. The public process it follows, the information it provides, the locations where the Division chooses to undertake management activities, and the techniques it employs all demonstrate a commitment to climate-informed, science-based decision-making. Through the integration of long-term data collection, professional expertise, public engagement, interagency collaboration, and adaptive management, DSPR works to ensure that state forests continue to provide resilient ecosystems that support biodiversity, wildlife habitat, watershed protection, carbon sequestration and storage, climate adaptation, and enduring ecological, social, and economic benefits for current and future generations.

DCR Summary of Comments and Responses about Specific Forest Management Proposals:

Eleven comments were received concerning the five proposed 2025 projects listed below. A synopsis of the comments is listed below for each of the referenced projects followed by DCR's response:

- Chicopee State Park (Comments 1,2, and 28)
- Myles Standish State Forest (Comment 10, 11, and 28)
- October Mountain State Forest (Comment 15 and 17)
- Windsor State Forest (Comment 26 and 27)
- Savoy State Forest (Comment 21 and 22)

Chicopee State Park

Comment: *Chicopee State Park* (Comment 1): *“Do not do it. This is disputed conservation area.”*

Response: Public safety concerns associated with declining red pine plantations and increased wildfire risk will be addressed, focusing on removing hazardous red pine and Scots pine trees that improve safety and help protect park visitors, staff, and surrounding communities.

Comment: *Chicopee State Park* (Comment 2): *“I learned right before Christmas of an asinine plan by the state to bring in heavy machinery to Chicopee State Park, clear cut massive sections, sell the logs worth money and open burn everything else. This is the most outrageous thing I’ve heard from Massachusetts DCR in a while. First of all, logging should NEVER happen on protected park land in Massachusetts. Second of all, clear cutting with heavy machinery will damage native trees like Oak and Maple, and some of the endangered species that grow in this forest ... Third of all, burning anything is illegal in Chicopee. There is a burn ban in almost all of Hampden county, including all of Chicopee.”*

Key concerns include:

- *General opposition to forest management activities*
- *Emphasis on:*
 - *Protection of conservation land*
 - *Avoidance of ecological disturbance*

Response: Public safety concerns associated with declining red pine plantations will be addressed.

Infestations of red pine scale have led to widespread tree mortality resulting in large numbers of standing dead and weakened trees. These conditions significantly increase the risk of falling hazards (branches and trees) and contribute to an elevated wildfire threat, particularly the potential for high-intensity crown fires.

The project area includes removing the declining red pine plantation impacted by red pine scale, a native pest, creating hazardous fuel loads and reduced forest resilience and declining non-native Scots pine. The removal of hazardous red pine and Scots pine trees will reduce fuel loads and minimize wildfire risk, improve safety and help to protect park visitors, staff, and surrounding communities.

Massachusetts regulations allow permitted exceptions for controlled burning under 310 CMR 7.00 when activities are reviewed, approved by DEP, and properly managed.

Comment: Chicopee State Park (Comment 28): *“We oppose the project in Chicopee Memorial State Forest for a number of reasons, but in particular, “prescribed” burning. Open burning, even if “prescribed,” is prohibited in Chicopee ... These prescribed burns should not occur near homes in the first place and not in the and not in the City, as regulated under Massachusetts 310 CMR 7.00: Air pollution control.”*

Key concerns include:

- *Open burning prohibited: Prescribed burns are not allowed in Chicopee under state and local regulations.*
- *Air quality risks: Burning could worsen air pollution and violate particulate matter standards.*
- *Health and location concerns: Burns should not occur near homes or within city limits.*
- *No agricultural exemption: The project doesn’t qualify as “agriculture,” so it can’t bypass restrictions.*
- *Regulatory noncompliance: The proposal conflicts with Massachusetts air pollution control rules.*
- *Conclusion: The project should be canceled due to these violations.*

Response: Massachusetts regulations allow permitted exceptions for controlled burning under 310 CMR 7.00 when activities are reviewed, approved by DEP, and properly managed. Prescribed fire is a recognized, land management practice for wildfire risk reduction and ecological restoration and is authorized when conducted under DEP permits. The proposed management activities will be conducted under the management of the Massachusetts Bureau of Forest Fire Control and in compliance with applicable state regulations and under the regulatory authority of the Massachusetts Department of Environmental Protection (DEP). All burns must meet strict air quality and safety requirements and are carried out only under conditions that minimize smoke impacts, including consideration of wind, atmospheric conditions, and nearby residences. Burns are postponed if these standards cannot be met.

This area has an increased risk of wildfire, including high-intensity crown fires. Given nearby homes to the east and prevailing winds, unmanaged fuels pose a public safety risk. Tree thinning and prescribed fire for fuel reduction are intended to mitigate these risks.

Myles Standish State Forest

Comment: Myles Standish State Forest (Comment 10): *“On one hand, I support planning for wildfire, especially as our climate becomes hotter & drier. I support removing non-native species & monocultures, and restoring native habitat. And I understand that Atlantic Coastal Plains Pine Barrens species are rare, and need sufficient habitat. However, given the extensive restoration & management*

that MSSF has already undergone, I worry too much is being converted to open-canopy Pine Barrens & savannah...”

Key concerns include:

- *Biodiversity & Ecosystem Health*
 - *Concern about removal of native oaks*
 - *Potential loss of habitat and species diversity*
- *Climate & Carbon*
 - *Advocates for passive management to maximize carbon storage and soil health*
- *Fire Management*
 - *Acknowledges need for fire mitigation but questions extent of clearing*
- *General Concern*
 - *Impacts on scenic quality and ecosystem stability*

Response: In support of Executive Order 618 on Biodiversity, the creation and enhancement of diverse landscape types, such as Pine Barrens, allows for a variety of plants, trees, and animals to survive. This project enhances the unique and rare qualities of the Pine Barrens while addressing threats due to low vegetation that lead to wildfire risks.

No oaks are proposed for removal. Treatments of the understory vegetation as well as smaller trees, shrubs, and low vegetation will reduce wildfire risk while maintaining the diversity of the tree canopy

Strategic thinning will improve safety by strengthening fuel breaks, while minimizing unnecessary disturbance. These actions support rare species that depend on open-canopy habitats.

This management project represents the final phase of a wildfire risk reduction strategy in Myles Standish State Forest. The proposed fuel break is intended to protect public safety and nearby communities by reducing vegetation in targeted areas, helping to slow wildfire spread and improve firefighting effectiveness.

Comment: Myles Standish State Forest (Comment 11): *“Thank you for an excellent presentation of the fire risks. I was moved to learn that a fire back in the 70's at the same location proposed for treatment had resulted in severe injuries to 8 local firefighters. This is a link to a story about the 50th anniversary of that fire. [“Plymouth marks 50th anniversary of forest fire that critically injured two firefighters”](#) Perhaps a sign could be posted to memorialize the event and to help educate visitors to Myles Standish State Forest.”*

Response: Interpretive or memorial signage is a meaningful way to honor those affected while educating visitors about wildfire risk and the role of active management in Myles Standish State Forest.

Comment: Myles Standish State Forest (Comment 28): *“The management proposal for the Myles Standish State Forest Reserve is also highly questionable... This is in an area with a history of*

extensive cutting and prescribed burning for “pine barrens habitat restoration” and for “fire prevention,” and this project is intended to support those efforts. We have commented extensively in the past about our concerns related to these management practices in general, and in Myles Standish State Forest in particular, and remain firmly opposed to logging in this “Reserve.” We find no substantial evidence that these practices are necessary or effective. On the contrary, there is substantial evidence that they are harmful to native ecosystems, climate stability, and public health.”

Key concerns include:

- *Questions about necessity and effectiveness of fuel/fire breaks and related management*
- *Opposes logging and tree removal in a designated “Reserve”*
- *Concerns about harm to native ecosystems and biodiversity*
- *Concerns about negative climate impacts*
- *Concerns about potential public health impacts*
- *Opposition to repeated “pine barrens restoration” and fire management practices*
- *Claims insufficient evidence to justify these interventions*

Response:

The proposed fuel break within Myles Standish State Forest is the final segment of a broader wildfire risk reduction strategy designed to enhance public safety and protect surrounding communities. Fuel breaks are a widely recognized forest management tool that help reduce the intensity and rate of wildfire spread by creating areas where vegetation fuels are managed and maintained at lower levels.

This project is strategically located adjacent to developed areas and is intended to provide firefighters with improved access and a safer location from which to suppress wildfires. By reducing the continuity of flammable vegetation, the fuel break can help slow the movement of a fire, increase opportunities for containment, and reduce the potential for a wildfire to spread from the forest into nearby residential neighborhoods and other developed properties.

While no single management action can completely prevent wildfires, fuel breaks have proven effective when incorporated into a comprehensive wildfire preparedness and response program. The fuel break is one component of an integrated approach that includes forest management, emergency response planning, public education, and ongoing maintenance activities.

Given the unique wildfire risks associated with the pine barrens ecosystem within Myles Standish State Forest and the proximity of homes and infrastructure, completion of this final fuel break segment is considered an important public safety measure that will help reduce wildfire risk and improve emergency response capabilities for years to come.

Priority Habitat designations are important for rare species protection. State wildlife planning coupled with the Healey-Driscoll Administrations Executive Order 618 on Biodiversity, explicitly emphasizes a broader, landscape-scale conservation strategy that prioritizes habitat diversity, connectivity, and a mix of forest conditions and ages across the landscape.

Logging within a reserve is managed under a multiple-use conservation mandate that allows for active stewardship where it advances ecological, resiliency, or public safety objectives. Prescribed fire and fuel management treatments are effective methods for reducing hazardous fuel loads, moderating potential fire behavior under extreme conditions, and maintaining fire-adapted ecosystem characteristics in eastern forests. These practices have implementation standards to minimize short-term air quality impacts, reducing the likelihood of higher-emission, high-intensity wildfire events that pose greater public health risks.

Concerns about necessity and effectiveness demonstrate that fuel treatments, prescribed fire, and structural forest management reduce fire intensity, improve landscape resilience, and support habitat diversity when applied at appropriate scales and under adaptive management frameworks. Accordingly, the proposed projects incorporate a dynamic understanding of forest ecosystems shaped by both natural and human influences over time.

Practices are evaluated through an adaptive management framework that incorporates monitoring, ongoing scientific review, and adjustment over time. The project will sustain biodiversity, ecological function, and landscape resilience in the face of increasing ecological and climatic variability, while balancing ecological, safety, and conservation objectives across the state forest system.

October Mountain State Forest

Comment: (Comment 15): *“I am writing with comments on the proposed DCR Borrow Pit forest management project planned for October Mountain State Forest in the town of Washington, MA. I am deeply concerned that this plan will disturb the forest environment which has significant wildlife activity, will cut mature healthy trees and potentially mar the view of October Mountain Reservoir. ...”*

Key concerns include:

- *Project-Specific Concern*
 - *Opposition to logging near reservoir areas*
 - *Concerns about visual impacts and water quality*
- *Biodiversity*
 - *Habitat disruption and fragmentation*
- *Climate*
 - *Preference for maintaining mature forest for carbon sequestration*

Response: Forest management will encourage a diversity of native trees and shrubs in the northern hardwood forest by removing exotic Norway spruce and suppress non-native invasive understory plants and create a mosaic of forest age-classes and forest structure that includes vertical layers in the forest from canopy to herb layer as well as varying conditions across the forest. Stand diversity supports a wider range of wildlife species and improves overall ecosystem resilience across the landscape. The Climate Forestry Committee Report states that agencies should “Prioritize for active management forest stands that have simplified structure and low species diversity, especially plantations that are in

poor health. Seek to enhance structural complexity and propagate diverse species well-adapted to the site and predicted future conditions.”

The 23-acre Norway spruce stand is composed of a single species, non-native plantation that is declining due to age, overcrowding, and Amarillo root rot. The removal of the plantation supports a more diverse, native forest structure. The project leaves coarse woody debris onsite to provide important ecological functions, beneficial habitat components, and nutrient cycling as the wood decomposes and reduces overland flow of water after rainstorms.

The 26-acre northern hardwood area adjacent to October Mountain Reservoir, Best Management Practices (BMPs) will be used during management activities protect water resources and minimize sediment movement. One hundred feet adjacent to the reservoir, as well as other sensitive resources, will be retained in its natural state to safeguard water quality and aquatic habitat. Temporary visual change may occur and are part of longer-term forest health and diversification goals. Scenic impacts are considered alongside ecological benefits and long-term forest conditions.

Management prescriptions recognize the value of mature trees, retain important structural features, include as large trees, while balancing the broader ecological objectives of a diverse age-class structure and increased structural diversity across the landscape.

Comment: October Mountain State Forest (Comment 17): *“I just wanted to be sure that riding on our snowmobile trail system would not adversely be interrupted by this project.”*

Key concerns include:

- *Potential Recreational impacts*

Response: Park staff are consulted on all forest management activities through DCR’s internal review process for proposed projects. Forestry and park staff work collaboratively to determine the best ways to maintain trail access during the project while ensuring the safety of all recreational users.

Projects are carefully planned to minimize disruptions to public access, particularly around trails and high-use areas. In some cases, temporary trail rerouting may be necessary to ensure the safety of riders and other visitors.

Windsor & Savoy State Forest

Comment Similar questions were posed for both projects.

(Comment 21,26) *“Invasive plant species should be managed and monitored for a period of at least ~five years following the timber harvest. This will help to limit invasive plant colonization of the disturbed area. Considering the invasive plant infestation levels are low and it is early...”*

(Comment 22, 27) *“How will the loss of thermal refugia via the removal of Norway Spruce be addressed/balanced? The Northeast forest is deficient in dead wood. This harvest is an opportunity to ensure there are adequate amounts of dead wood in all forms. Studies show the value of retaining even a few legacy overstory trees...”*

Key concerns include:

- *Need for at least ~5 years of post-harvest monitoring of invasive plant species*
- *Risk of invasive plant colonization following forest disturbance from timber harvest*
- *Preference for manual/mechanical invasive species control over herbicide use, especially in early invasion stages*
- *Concern over loss of thermal refugia due to removal of Norway spruce*
- *Need to ensure adequate retention of dead wood in forest stands*
- *Importance of retaining legacy overstory trees to maintain habitat complexity and structural diversity*
- *Concern about loss of ecological redundancy for hemlock following removal of healthy Norway spruce*
- *Uncertainty regarding retention of beech trees showing potential resistance to Beech Bark Disease and Beech Leaf Disease*
- *Concern that cutting mature ash to encourage sprouting is not supported by research*
- *Acknowledgement that some white ash may have natural resistance to Emerald Ash Borer and should be retained*
- *Concern that retaining only small-diameter ash (≤ 10 " DBH) constitutes a diameter-limit cut, which is discouraged*
- *Risk that removing 8–10" DBH ash eliminates sexually mature trees and reduces regeneration potential*
- *Concern over loss of genetic diversity in ash populations due to selective removal practices*
- *Opposition to pre-salvage and salvage logging of ash trees*
- *Recommendation to retain ash across all size and age classes, including dead and declining individuals*

Response: The Two Cubs Project in Windsor State Forest and the Center Brook Project in Savoy Mountain State Forest focus on the removal of Norway spruce plantations and a white pine plantation. The Windsor State Forest project is a continuation of previous management that removed rows of plantation allowing native forest to regenerate between the rows. Both projects will release native regeneration and, in the case of Two Cubs, facilitate the regeneration of native red spruce.

Norway Spruce and Thermal Cover

The removal of Norway spruce plantations will reduce localized thermal cover and conifer-associated habitat, and research (Ritter et al. 2022) confirms these plantations provide suitable habitat for some native species. The Norway spruce stands are overstocked and beginning to decline due to root rot diseases, overcrowding, as well as damage from weather events.

Impacts are expected to be limited due to small plantation size, abundant natural regeneration, and nearby similar habitat. Retention of healthy legacy trees, including Norway spruce, is important to maintain structural complexity and ecological continuity during conversion. Norway spruce has regenerated on the Windsor site and is expected to continue to be a component of the forest. On the Savoy site balsam fir is common in the understory and will become the softwood component along with red spruce.

Dead Wood

A post-harvest protocol to measure dead and downed woody material will provide a standardized basis for tracking changes in forest structure and ensure retention targets and ecological conditions are evaluated consistently across stands. Dead wood is quantified before and after harvest and monitoring shows that post-harvest stands contain equal or greater amounts of woody material. This increase is associated with enhanced structural diversity and habitat complexity over time.

Retention of dead wood, legacy overstory trees, and other structural elements to maintain habitat complexity, thermal refugia, and overall ecosystem function are considered. These features will support microclimate buffering, wildlife habitat, and long-term stand resilience. Concerns about the potential loss of thermal refugia associated with the removal of species such as Norway spruce are addressed through the retention of canopy structure, mixed-species composition, and legacy trees where appropriate.

American Beech

As Massachusetts faces the potential extirpation of beech, there is focus on replacing the loss of beech mast through the regeneration of other sources of mast. The Savoy Mountain State Forest project will regenerate soft mast species such as choke cherry, pin cherry, black cherry, and blackberry. While there is very little beech within the Windsor State Forest project area, the prescribed treatments will create conditions suitable for the regeneration of similar soft mast species.

As background, Beech Bark Disease (BBD) has been affecting American beech in Massachusetts for years, reducing vigor and causing a slow decline with relatively few beech showing the characteristic smooth bark. Beech Leaf Disease (BLD) was first detected in Massachusetts in 2020 and quickly spread throughout the state. It is causing rapid decline and mortality, with some speculation that it is in part due to already low vigor from BBD. DCR is monitoring the progression of BLD within the state and coordinating with other states research efforts. To date DCR's Forest Health Team has not found any resistant trees, however, American beech trees with minimal disease symptoms will be retained due to their possible resistance to beech bark disease complex and beech leaf disease with the hope that they show resistance.

White Ash

The effects of Emerald Ash Borer (EAB), both short-term and long-term, are taken into consideration. There is mature ash (fruiting age) in the Windsor State Forest project and will retain an ash component that is greater than 10" DBH and healthy enough to produce seed, including the retention of larger healthy individuals. Specific areas are excluded from harvest to maintain ash seed sources and structural continuity.

Projects follow established ash management protocols to balance regeneration, structural retention, and long-term species persistence under ongoing pressure from the Emerald Ash Borer. DCR recognizes that "Lingering ash" occurs at low frequencies, is variable in its distribution, and is

recognized as a potentially important genetic resource. DCR's Office of Research is facilitating the work of conservation partners on identifying lingering ash within the state.

Studies indicate that retaining ash of all age classes, including the regeneration of ash, is the best course of action in response to this highly destructive insect, and that the use of silvicultural techniques to promote ash regeneration is an essential component of this approach. A recent study in New England (Higgins et al.) showed that there are higher rates of ash regeneration in harvested areas, due in part to the conditions created through harvesting that match the species' light level needs for germination and early growth. This framework reflects a broader body of research indicating that active, disturbance-based management can influence regeneration dynamics and sustain ash as a component of forest systems, even where long-term canopy recruitment remains uncertain (Higgins et al. 2025; Petrice and Haack 2011; Cardou et al. 2015). Additional studies demonstrate variable ash sprout survival under emerald ash borer pressure, suggesting the potential for ongoing recruitment and partial persistence of ash within regenerating cohorts (Petrice and Haack 2011; Cardou et al. 2015). While not all individuals are expected to reach maturity, these dynamics support the conclusion that ash can remain an active, if reduced, component of forest composition.

Invasive Plant Treatments

Japanese barberry and Oriental bittersweet, Glossy buckthorn are present at Windsor State Forest.. It is possible that invasive plants are present within the Savoy Mountain State Forest. More field work will be conducted to document presence/absence, the extent, and specific method and timing of control. Mechanical control methods are the preferred treatment. Herbicides will be used when mechanical approaches are not feasible or would cause excessive disturbance. All treatments are conducted by licensed applicators in consultation with forest ecologists.

Wildlife Connectivity

The Windsor State Forest Two Cubs and Savoy Mountain State Forest Center Road projects are part of a broader Massachusetts Dynamic Forest Restoration Initiative to restore a mosaic of forest age classes and habitat conditions. Through regeneration harvests and structural retention, these projects will create a diversity of young forest, maturing stands, and retain legacy features that improve habitat connectivity and support a wide range of wildlife species.

The projects will also encourage the regeneration of soft mast-producing species and increase habitat complexity, benefiting birds, mammals, pollinators, and other native wildlife.

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