

# MassWildlife's Forest Management Projects: Feedback Responses

Projects planned in 2025 were posted on MassWildlife's website and the public was invited to provide feedback from June 3 through July 6, 2025. Comments were received from six individuals and organizations. The following is a summary of this feedback along with responses from MassWildlife's forest project planning team.

MassWildlife staff genuinely thank those who took the time to review the projects and provide comments, the public feedback process is an invaluable early step in our project workflow. These projects have been carefully planned and support MassWildlife's critical mission of conserving freshwater fish and wildlife in the Commonwealth, including endangered plants and animals. MassWildlife works to restore, protect, and manage land for wildlife to thrive and for people to enjoy.

## Public feedback on project planned at Hawks Brook WMA

**Feedback:** Commenters expressed support for the project, for diversifying habitats at this site, and for the anticipated benefits to MESA-listed species.

**Response:** All MassWildlife habitat projects are planned and designed to support viable populations of species listed in the State Wildlife Action Plan (SWAP), including Massachusetts Endangered Species Act (MESA)-listed species. This project will directly benefit MESA listed amphibians and plants along with other SWAP species. Habitat management efforts will support diverse high elevation northern hardwood ecosystem habitats, including forests, fields and wetlands.

Feedback: Commenter provided information regarding road accessibility of project site during winter.

**Response:** Access is limited on town roads in winter and spring conditions. Proper care and attention will be made to ensure safe accessibility.

# Public feedback on project planned at High Ridge WMA

**Feedback:** Commenter expressed support for the project and was pleased to see the project's species and ecological benefits.

**Response:** All MassWildlife habitat projects are planned and designed to support viable populations of species listed in the State Wildlife Action Plan as Species of Greatest Conservation Need. MassWildlife's habitat management efforts work to support thriving ecological communities, both common and rare. According to the recent update to the MA State Wildlife Action Plan, 277, or 45% of all, Species of Greatest Conservation Need (SGCN) require open canopy habitat at some point in their life cycle. Further, young forest habitat conditions are critical to 87 of those species.

### Public feedback on project planned at Herm Covey WMA

**Feedback:** Commenter expressed support for the project and for the variety of management techniques mentioned. Commenter was glad to see aspen and pitch pine regeneration are part of the project.

**Response:** Through the various management techniques mentioned in the abstract for this project, MassWildlife will focus on oak, aspen (in select areas), and pitch pine regeneration to benefit both game and declining species. MassWildlife has seen a significant response from target species and vegetation communities following previous management actions at this site.

#### **General Public Feedback**

Some feedback was general in nature and not associated with a particular property or project. That feedback has been broken out by topic and listed below; MassWildlife's responses are provided directly afterward.

**Feedback:** One letter expressed support for forest management projects currently under consideration, specifically supporting actions that promote pine barrens and young forest habitats, removal of monoculture plantations, and increasing resiliency against threat from invasive insects.

Response: Early successional and young forest conditions continue to decline and are critical habitat in Massachusetts for 277, or 45% of all, Species of Greatest Conservation Need, including declining populations of songbirds and native pollinators, as identified in the newly updated MA State Wildlife Action Plan. MassWildlife's Habitat Program strives to maintain and create diverse habitat conditions, including mid- and late-successional forests along with early successional forest conditions, to ensure a healthy and diverse mosaic of habitats across the landscape that support a wide array of species. Habitat restoration on a limited portion of our lands ensures that MassWildlife contributes positively to the Commonwealth's climate change mitigation strategy, including increasing carbon storage, while also ensuring that all the Commonwealth's plants and animals continue to thrive.

**Feedback:** Mixed responses on details in proposals. One organization felt summaries provided clear, comprehensive outlines while another submission felt there was a lack of information on critical factors.

Response: MassWildlife's habitat project descriptions are designed to be accessible to individuals of all backgrounds and experiences in a clear and understandable format so the public can best provide feedback. The public feedback comment period is an early step in our project workflow and necessary before we finalize some details. Forest cutting plans are not completed and submitted until after we receive public input on proposed projects to allow relevant input to be incorporated into the plans. As we move forward with projects, additional information will be made publicly available at the same <a href="https://webpage">webpage</a> as these projects were posted, including our approved forest cutting plans (see the section "Ongoing Management Projects"). There are also numerous additional resources on Mass.gov that provide detailed overview and background on habitat restoration and management, critical habitats, and the State Wildlife Action Plan:

- Massachusetts State Wildlife Action Plan (SWAP)
- Why is habitat restoration & management needed on MassWildlife lands?
- BioMap: The Future of Conservation in Massachusetts
- Habitats and Management Recommendations

**Feedback:** One letter felt projects are inconsistent with the conclusions of the Climate Forestry Committee (CFC) and forests should be undisturbed in order to adhere to the conclusions of the Climate Forestry Committee.

**Response:** The CFC concluded that, going forward, both active and passive management should play important roles in Massachusetts forests. The CFC also acknowledged that forests may be managed for a variety of values, including biodiversity conservation. The report sites that "they all [CFC members] recognized that forest management covers a broad range of approaches from passive to active, and that it is often appropriate to employ different strategies simultaneously across a landscape to achieve mutual complex goals."

MassWildlife is committed to implementing the workplan in the <u>Response to the Report of the Climate Forestry Committee</u>, which outlines intended implementation of the recommendations of the CFC. Proposed projects are in line with the commitments made in the Response, including articulating how each project will advance biodiversity goals, at risk species, and Species of Greatest Conservation Need; minimize impacts to healthy mature forests; and include relevant climate considerations. The climate considerations table included in each of the project summaries is based on the forest management guidelines developed jointly by the agencies based on the programmatic recommendations presented in the CFC Report and with the climate-oriented forest management strategies contained in the tables in Appendix A of that same report.

The <u>carbon budget analysis</u> for MassWildlife lands shows that carbon storage provided by forest growth far exceeds loss and positively contributes to the Commonwealth's climate change mitigation strategy. Importantly, even forests that experience management actions store and sequester carbon into the future, as do other important habitat types, including grasslands, shrublands, and wetlands, under MassWildlife's purview. Habitat restoration on a relatively small footprint has significant impact on providing high quality habitat for Species of Greatest Conservation Need, common species, and game species, which is core to the mission of the agency.

**Feedback**: One letter felt that the public outreach on these plans was inadequate.

**Response:** MassWildlife's proposed projects were posted online and publicly available. The comment period was June 3, 2025- July 6, 2025. The public feedback notice was shared through the Division's monthly e-newsletter, which is received by over 237,000 subscribers. It was also amplified by partners. MassWildlife's Habitat Program team is committed to public outreach, sharing their knowledge, and telling the stories of the amazing habitats and resources on our properties. Staff host and participate in multiple in-person and virtual events each year. Visit MassWildlife's <u>calendar</u> for upcoming events.

**Feedback:** One letter expressed concerns about the science supporting the use of prescribed fire as a management tool, the historic role of fire, and its role in reducing wildfire risk.

**Response:** Fire is a necessary and natural component of specialized habitats, natural communities, and ecosystems, such as sandplain grasslands, heathlands, barrens, oak woodlands and forests. These open or semi-open habitats occur at discrete locations within the Commonwealth where sandy or thin, rocky soils and harsh environmental conditions are conducive for the growth of specialized plants and the occurrence of periodic natural disturbances, such as fire. Fire-influenced habitats and natural

communities are documented hotspots for plant and animal biodiversity and support many rare and declining taxa that are adapted to and require fire to persist. There are numerous examples, including but not limited to those with woody underground stems (low bush blueberries), fire stimulated germination (bushy rockrose, sandplain gerardia, wild lupine, New Jersey tea), and growth of thick bark (chestnut oak) to protect against frequent low intensity fire.

While fire suppression and fragmentation of our landscape interfere with fire regimes, prescribed fire simulates this natural process and is an established safe and effective management practice among state and federal agencies, conservation partners, landowners, and research institutions that engage in wildlife habitat restoration and management throughout New England. Prescribed fire is an important strategy identified in the <a href="Massachusetts State Wildlife Action Plan">Massachusetts State Wildlife Action Plan</a> to achieve natural community and species conservation goals.

It is clear that fire occurred at some level on our landscape prior to European colonization, including at inland and coastal sandplains. If this were not the case, many fire dependent plant species would not occur on our landscape at all, so their presence provides strong evidence of past fire. In addition, this is documented through paleoecological studies, fine resolution charcoal analysis, tree ring studies with gap analyses, written accounts of early explorers and historians, and the sharing of Indigenous fire keeping knowledge and traditions by our tribal partners. MassWildlife does not manage to reflect a particular historic condition at an arbitrary point in time. Rather, management activities are site-specific and goal-oriented to meet the habitat requirements of the large suite of rare, declining, and representative species that occupy these specialized habitats.

Prescribed fire also increases resilience in the face of droughts and the resulting increase in wildfire. In the absence of management in pine barrens and other fire-influenced habitats, such fires may become catastrophic. Large, unplanned, and severe wildfires can threaten nearby development, release nearly all the carbon stored in an ecosystem, and severely impacting air quality. In contrast, planning, approvals, and notifications are in place to protect air quality during a prescribed fire. Selectively thinning trees such as pine and retaining tree oaks in the canopy helps reduce the spread of catastrophic crown fires and periodic low- to moderate-intensity prescribed fire lessens the likelihood of extreme wildfires and their associated impacts. Click here to learn more about prescribed fire.

**Feedback:** One letter expressed concern that prescribed burning may make areas more vulnerable to invasion by non-native plants.

**Response:** In environments that experience frequent natural disturbance, such as fire, native vegetation is adapted and able to respond quickly by resprouting or establishing from seed. Whereas many invasive plants cannot respond that quickly and do not become established in these harsh environments. Prescribed fire managed habitats, such as pine and oak barrens, ridgetop heathlands, dry oak woodlands, and other fire influenced habitats, generally have low numbers of invasive plants and are monitored on a regular basis for invasives once fire management is undertaken. When necessary, land managers are prepared to utilize other complementary control strategies to reduce invasive plants before and in coordination with continued prescribed fire activities in certain areas.

**Feedback:** One letter acknowledged that Southern pine beetles have been found in Massachusetts and believed that proposed projects can help to reduce potential impacts.

**Response:** Pitch pine ecosystems support a significant proportion of the region's rare and specialized species; however, as a result of climate change, these ecosystems are under threat from Southern Pine Beetle (*Dendroctonus frontalis*; SPB), a bark beetle native to Mexico and the southeastern US that has recently expanded its range into New England. Pitch pines are highly susceptible to attack by SPB, and dense pitch pine stands are at high risk of total stand loss if they become infested.

The Massachusetts Southern Pine Beetle Response Plan (2018) recommends forestry treatments, like stand thinning, to reduce the likelihood of an SPB infestation becoming established in pitch pine forest stands. The report also recommends the use of prescribed fire to reduce wildfire risk, promote regeneration, and control competing vegetation.

**Feedback:** One letter applauded MassWildlife's efforts to restore pine barrens, while another letter questioned whether species need pine barrens restoration in Massachusetts to survive and thrive in their natural range.

**Response:** Massachusetts supports the largest globally rare barrens system north of the New Jersey pine barrens. Many rare plants and animals, as well as more common species, benefit from efforts to restore and maintain barrens habitats. These include birds such as the whip-poor-will and prairie warbler, insects such as the barrens buck moth and frosted elfin butterfly, and native bees that specialize on dry, sandy sites. In the absence of appropriate management, barrens and the suite of associated species would continue to decline. Click here for more information about Massachusetts barrens.

**Feedback**: One letter supported the creation of young forests and appreciated the success of similar projects in the past, whereas another letter believed early successional habitats are plentiful and do not need to be created through habitat management projects.

Response: The 2020 Massachusetts State Forest Action Plan shows that 80% of Massachusetts forests are between 50-100 years old, with early successional forest/young forest conditions being extremely limited across the state and on a continual decline. Early successional and young forest conditions are critical habitat in Massachusetts for 277, or 45% of all, Species of Greatest Conservation Need (SGCN) as identified in the newly updated MA State Wildlife Action Plan, including declining populations of songbirds, native pollinators, and rare plants. This is consistent with recent publications, like the 2025 State of the Birds, which found that eastern forest breeding birds that rely on regenerating or disturbed forests continue be in precipitous decline. The scientific research and overwhelming consensus show that active habitat management is critical, works to promote species recovery, and supports not only specialist species, but the generalist species found in these places, as well. There are numerous other sites that MassWildlife manages to support a high-quality mosaic of habitat types and seral stages across the landscape, including old growth characteristics.