



# DIVISION OF FISHERIES & WILDLIFE

---

## MassWildlife's FY25 Forest Management Projects: Feedback Responses

Projects planned for FY 2025 were posted on MassWildlife's website and the public was invited to provide feedback from September 9 through October 9, 2024. 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.

### Public Feedback on projects planned at Eugene Moran WMA

**Feedback:** Early successional forest habitat helps support ruffed grouse populations and hunting opportunities.

**Response:** Early successional and young forest conditions continue to decline and are critical habitat in Massachusetts for over 28 Species of Greatest Conservation Need (SGCN) including ruffed grouse, declining populations of songbirds, and native pollinators as identified in the [MA State Wildlife Action Plan](#).

**Feedback:** Tree cutting will negatively impact aesthetics and have short-term negative impacts on wildlife.

**Response:** Over time this project will have a considerable net-positive effect on biodiversity conservation and plant and animal populations, especially when considered at a landscape scale. Any perceived short-term impacts on aesthetics will dissipate quickly as the temperate conditions of Massachusetts allow for rapid vegetation growth.

**Feedback:** Concern that financial gain is the motivation behind forestry projects.

**Response:** MassWildlife's habitat management activities are funded from a range of sources, including federal, state, and various grant funds. Many of these projects do not generate any timber revenue and even those that do often cost more to implement than the income generated. Because sites are selected for habitat outcomes rather than income generation, this often involves working in previously disturbed sites or other areas (e.g. dry barrens) that tend not to be well suited to generating substantial income from wood products.

## **Public Feedback on projects planned at Mashpee Pine Barrens WMA**

**Feedback:** There is a need for collaboration with the Mashpee Wampanoag Tribe.

**Response:** MassWildlife works closely with the Mashpee Wampanoag Tribe to further indigenous stewardship goals and mutual outcomes for land stewardship in southeastern Massachusetts including the Mashpee Barrens. A current America the Beautiful Challenge Grant secured by MassWildlife involves a partnership with the Mashpee Wampanoag Tribe and other partners and all federally recognized tribes are given an opportunity to review and comment on planned forest tree cutting operations within their respective historic area of interest.

### **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:** 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. Many native species are specifically adapted to and require fire to persist, and their fire adaptive traits are dependent on different fire regimes, fire intensities, seasons, and intervals between fires. There are numerous examples including but not limited to post-fire sprouting from root crowns (post oak), woody underground stems (low bush blueberries), epicormic branching (pitch pine), fire stimulated germination (bushy rockrose, sandplain gerardia, wild lupine, New Jersey tea) or 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 [Massachusetts State Wildlife Action Plan](#) to achieve natural community and species conservation goals.

Although individuals may debate the historic role of fire on the landscape prior to European settlement and the extent of Indigenous fire keeping practices, 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 leads to more resilient habitats and more robust and resilient populations of plants and animals that depend on these specialized habitats. Numerous fire-influenced landscapes in Massachusetts are vulnerable to drought and the resulting increase in wildfire. In the absence of management in pine barrens and other fire-influenced habitats, such fires may become catastrophic, reaching into tree canopies and potentially growing into rolling crown fires, creating erratic and intense fire behavior, and threatening nearby homes, schools, and businesses. Large, unplanned, and severe wildfires can release nearly all the carbon stored in an ecosystem, including volatilizing carbon stored in soils 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. Managing these forests and woodlands with periodic low- to moderate-intensity prescribed fire, lessens the likelihood of extreme wildfires and their associated threats to lives, property, and the atmosphere. [Click here to learn more about prescribed fire.](#)

**Feedback:** There is no credible evidence that any 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:** Early successional habitats are plentiful and do not need to be created through habitat management projects.

**Response:** Information from the Massachusetts State Forest Action Plan 2020 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 over 28 Species of Greatest Conservation Need (SGCN) including declining populations of songbirds and native pollinators as identified in the [MA State Wildlife Action Plan](#). The scientific research and overwhelming consensus show that active habitat management is critical and works to promote species recovery. [Click here to learn more about young forests and the wildlife that depend on them.](#)

**Feedback:** 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. MassWildlife is committed to fully implementing the CFC recommendations, including those directly related to the agency's habitat goals and forest reserves. All our projects have been reviewed for consistency with the CFC recommendations as reflected in the project summaries and climate considerations tables posted for public comment. Habitat restoration on a limited portion MassWildlife-managed lands results in some carbon release, while the carbon budget analysis 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.

**Feedback:** Support for forest management projects currently under consideration. Projects like this are essential for American woodcock and ruffed grouse. Forest management can improve forest health, biodiversity, and climate resilience. Projects align with Massachusetts Biodiversity Executive Order and the Massachusetts Forest Action Plan.

**Response:** Early successional and young forest conditions continue to decline and are critical habitat in Massachusetts for over 28 Species of Greatest Conservation Need (SGCN) including declining populations of songbirds and native pollinators identified in the [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 that all of the Commonwealth's wildlife can thrive. 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.