Submitted via email

TO: Massachusetts Division of Fisheries and Wildlife Mass.Wildlife@mass.gov
CC: Melissa Hoffer, Climate Chief climate.office@mass.gov
Rebecca Tepper, Secretary, Executive Office of Energy and Environmental Affairs env.internet@mass.gov
DA: July 6, 2025
RE: Comments on Division of Fisheries and Wildlife upcoming forest management projects — posting date June 2, 2025

Thank you for providing this opportunity to comment on the following upcoming forest management projects (dated June 2, 2025), which are listed by the Division of Fisheries and Wildlife (MassWildlife) here [1]:

- Hawks Brook WMA Project
- Herman Covey WMA Habitat Restoration Project
- High Ridge WMA Habitat Restoration Project
- Menameset Habitat Restoration Project
- Myles Standish Complex Pine Barrens Restoration Project
- Muddy Brook WMA Habitat Restoration Project
- Quaboag WMA Oak Woodland Restoration Project
- Red Brook WMA Habitat Restoration Project
- William Forward WMA Red Pine Plantation Removal Project

We have a number of questions and concerns regarding these planned projects.

Our first question is: How are these nine projects related to the comments by MassWildlife on Executive Order 618 (E.O. 618)?

On September 21, 2023, Governor Maura Healey issued Executive Order No. 618: Biodiversity Conservation in Massachusetts (E.O. 618). [2] E.O. 618 declares that "biodiversity conservation is a priority for the Healey-Driscoll Administration." The order directs the commissioner of the Department of Fish and Game (DFG) to "conduct a comprehensive review of the existing efforts of all executive department offices and agencies to support biodiversity conservation in Massachusetts," to "recommend biodiversity conservation goals for 2030, 2040, and 2050 and strategies to meet those goals," and to "update the Governor and Lieutenant Governor on this review and recommendations within 180 days of this Order." To our knowledge, this update has not occurred.

This leads us to question whether or not the subsequent implementation, to be determined by the Executive Office of Energy and Environmental Affairs (EEA), can be included as a reference for any of these project management plans. We are also concerned that these project plans may be premature in light of past public comments received by MassWildlife, which have raised concerns about forest management plans, and the fact that a number of the themes repeated throughout the nine summaries have been questioned by scientists and other stakeholders.

We note that each of the summaries of the upcoming projects claims consistency with the report of the Climate Forestry Committee (CFC) [3], which was issued on January 3, 2024. The report concluded that (emphasis added):

> *Commonwealth land managers and agency leadership must be empowered to make considered decisions,* ***informed by public input,*** *that involve tradeoffs and simultaneously seek to achieve multiple goals.* (p. 26)

We are concerned that the public process does not reflect this recommendation. There is no stakeholder list, or outreach to generate one, for notifications regarding management projects. There are no site visits before a draft plan is finalized. The cutting plans are absent. And there is no obvious way to find these plans on the MassWildlife website. [4]

Furthermore, none of the concerns that we raised with regard to the last group of draft management plans [5] appear to be addressed in the final versions of the previous group of plans. The fact that only six comments were received last year on these plans suggests that the public is not adequately informed when there is an opportunity to comment. This is not what we consider to be decisions "informed by public input."

Each summary for the upcoming forest management projects lists activities that are claimed to be consistent with the CFC recommendations. For instance, all of the summaries state:

> *This project was designed to ensure consistency with recommendations for climate-oriented forest management provided by the Climate Forestry Committee.…*

However, there is no direct reference to the CFC report to confirm that these activities are, indeed, consistent with these recommendations.

Overall, the project summaries provide broad goals, objectives, management strategies, and rationales that are commonly accepted and used in management plans developed by our state land management agencies. Yet, these summaries do not provide the detail needed for the public to assess their potential benefits or effectiveness.

For example, none of the summaries include a comprehensive inventory of the species present in the areas, specific cutting plans, or timetables for follow-up assessments of the effectiveness of management strategies. These questions are important within the scientific community and among the public, and we believe they deserve more thought and consideration before a commitment is made to approve these projects.

Many of the project summaries include claims and planned actions that are similar or identical. They also share a lack information on many critical factors. A number of examples are discussed below.

1. Every project in the current group of management proposals (except for High Ridge WMA) involves either prescribed burning or intensive management to purportedly

reduce wildfire risk. Five of the nine projects are included on the “Upcoming MassWildlife prescribed fire locations” website [6].

For instance, the Herman Covey WMA plan calls for (emphasis added)

> ***Silvicultural burning*** *for initiating/maintaining regeneration.*

Prescribed fire (or “silvicultural burning”) is problematic for a number of reasons. First, there is no credible scientific evidence that fires played a significant role in Massachusetts before the arrival of Europeans. [7][8][9] Prescribed burning creates artificial landscapes that do not exist in natural New England forests.

Second, numerous peer-reviewed scientific studies have concluded that prescribed fires are not effective in reducing fire risk or intensity and cause significant collateral damage (emphasis added):

> *A large body of scientific evidence and opinion, including from a growing group of U.S. Forest Service scientists, concludes that* ***thinning—including thinning-plus-burning—and post-fire logging/clearcutting increase overall tree mortality and carbon emissions, make wildfires spread faster and/or burn more severely,*** *and our current funding and management focus on tree cutting and removal in wildland forests is putting nearby communities at greater risk.* [10]

Third, beyond questions about its effectiveness, there is credible scientific evidence that prescribed burning makes areas more vulnerable to invasive species and usually requires ongoing maintenance with periodic burning of these areas to maintain some level of large fire mitigation. [7]

Fourth, human-created forest fires are not climate friendly. For example, they release vast amounts of carbon into the atmosphere that would likely not be released in the near future as a result of natural wildfires. [7]

Fifth, prescribed fires are not good for public health. The Quaboag WMA plan and others claim that this burning is done

> *in a particular place and time, under established conditions and safety requirements to accomplish resource management goals*

However, the plans also acknowledge that

> *Threats to human health from severe smoke impacts both locally and potentially at long distances.*

It is well documented that both short-term and long-term human exposure to wood smoke from burning creates serious negative health outcomes, including hospitalizations and mortality. [11] Prescribed fires create situations of 100% guaranteed circumstances of deadly air pollution in order to supposedly prevent a highly unlikely forest fire in any given location. It is not an exaggeration to say that during a “carefully” conducted fire, on that day or the following few days, individuals

may suffer heart attacks, strokes, asthma attacks, miss work, become hospitalized, become permanently disabled, or die.

In light of the danger to the public, accurate historical data regarding fire, and the negative climate impacts of prescribed burning, the most climate-smart strategy for Massachusetts forests is to allow them to regenerate through proforestation, creating a diverse forest that will be more drought tolerant, less fire-prone, and more beneficial to climate stability. [7][10][12]

The CFC report does not recommend prescribed burning as a forest management strategy. [3] Three of the members of the CFC reinforced this in comments they sent to Stephanie Cooper, Under Secretary for Environment, and other key officials, stating that (emphasis added):

> *We are writing out of concern that the Division of Fisheries and Wildlife is **continuing to clear forests and advance mechanical treatments and prescribed fire to perpetuate early successional habitat based on faulty information and under false premises**.*[8]

Another fire-related strategy is intensive management, purportedly for wildfire mitigation. For example, the Myles Standish WMA plan (emphasis added) states:

> *Restoration efforts focus on **reducing the canopy bulk density** of pitch pine, retention of widely spaced oak and pitch pine trees, and a natural return of native shrubs and herbs in the understory. **This reduces the risk of catastrophic crown fire**, enhances habitat for native plants and animals, and increases biodiversity….*
>
> *This project was designed to ensure **consistency with recommendations for climate-oriented forest management provided by the Climate Forestry Committee, and includes**:*
>
> - *thinning to decrease tree density **reducing vulnerability to wildfire** and harmful insects, like the southern pine beetle;…*
> - *thinning to prepare the site for the **reintroduction of low-intensity fire** to promote resilient native vegetation;*
> - *and **restoring fire-influenced ecosystems** that provide reliable carbon sinks in the long term, compared to vulnerable dense fire-excluded forests.*

The CFC report does not recommend thinning and other intensive forest management as an effective strategy to reduce wildfire risk. [3] And because there is no credible scientific evidence that fires played a significant role in Massachusetts before the arrival of Europeans [7][8][9] and large wildfires are rare in New England today, there is no need for intensive treatments to address a virtually nonexistent threat.

For these reasons, we are calling on MassWildlife to end prescribed burning and other intensive management treatments intended to expand or maintain early-successional habitats, as recommended in the CFC report [3, page 29] or to reduce wildfire risk on state-owned lands. Of course, the exception is management needed for public health or safety.

2. Some of the projects are described as pine barrens "restoration." The Muddy Brook WMA project summary states (emphasis added):

> *Muddy Brook WMA is a large natural community labeled as a riparian inland barren located in central Massachusetts….*
>
> *This project will build on past successful habitat restoration work that has taken place on other portions of Muddy Brook WMA.* ***Prescribed fire is planned to maintain the grasslands and woodlands****. Highlights:*
>
> - ***Targeted tree removal*** *will create conditions that promote vigorous growth of blueberry heathlands, scrub oak thickets, as well as oak regeneration to provide cover for declining wildlife, including* ***ruffed grouse, eastern whip-poor-will, and prairie warbler****.*
> - *This project* ***will benefit state-listed insects****, like the* ***slender clearwing sphinx moth****, which require pitch pine and oak woodland habitats with extensive low-bush blueberry patches to complete their lifecycle.*
> - ***Promoting open oak and pitch pine woodlands*** *will reduce the area's vulnerability to harmful insects, like spongy moth and southern pine beetle.*

The summary for the Myles Standish Complex states that it:

> *contains one of the largest remaining pine barrens in the world. The health of these ecosystems is crucial, as* ***they provide homes for many highly-specialized and declining plants and animals,*** *including over 40 species listed under MESA, which are often found only in pine barrens.*

There is no credible scientific evidence that there are any species that need pine barrens restoration in Massachusetts to survive and thrive in their natural range. [7][8] Beyond that, the concept of pine barrens "restoration" is open to question. It has been used to justify logging, burning, mowing, and herbicide use where there is no credible scientific evidence that these pine barrens existed before European settlement. For example, a scientific survey concluded that this is the case for the Myles Standish Complex (emphasis added):

> *In 1984 the Massachusetts Department of Environmental Management asked us to study the vegetation and fire history of Myles Standish State Forest….*
>
> *Analysis of pollen preserved in sediments of the two ponds shows that boreal vegetation consisting of jack pine and spruce was present in the area about 10,000 years ago, but* ***the area was covered by white pine and oak forests when the Pilgrims arrived in the early I7th century****….*
>
> *Our results suggest that* ***the present vegetation of Myles Standish State Forest is quite different from the white pine-hardwood forests of pre-colonial times. Land-clearing associated with settlement and extensive fires that have burned during the past two centuries have produced the pine-oak barrens that cover much of the landscape today****.*[13]

The pine barrens restorations being done in Massachusetts are uncontrolled experiments. If we are to conduct such experiments, they should be in very limited areas, preceded by comprehensive biological surveys, and then followed by decades of monitoring and assessment to determine whether they are successful. None of the current MassWildlife pine barrens restorations involve this level of evaluation.

For these reasons, we are calling on MassWildlife to end pine barrens restorations.

3. These projects are heavily focused on expanding early successional habit. All of the project summaries state:

> *Biologists plan habitat projects that may* ***include tree cutting, mowing, and mulching*** *to strategically increase open habitats, promote patches of vigorous young forest, restore natural processes, and remove invasive plants."*

The William Forward WMA summary states that (emphasis added):

> *These habitats provide cover, food, and nesting sites for declining wildlife* ***including ruffed grouse, Eastern whip-poor-will, Eastern towhee, and black ducks.***

These species are all common throughout their natural ranges and do not need thinning, forest-clearing, or burning of forests to survive and thrive. A number of the species, such as American woodcock, ruffed grouse, black duck, and bobcat, are clearly not endangered because they are actively hunted. [7]

In their letter to Under Secretary Cooper, the three members of the CFC confirmed that this creation of artificial early-successional habitats is not supported by credible scientific evidence (emphasis added):

> *As you may recall,* ***the Committee on Forests and Climate (CFC) raised strong concerns in its report and in discussions with agency heads over the practice of creating early successional habitat through artificial means that reduce forest area and prevent natural forest regrowth.*** *The arguments behind this opposition are based on extensive peer-reviewed literature that shows that (1) early successional habitat of grasslands, shrublands, and young forests is an artifact of Colonial deforestation and environmental degradation; (2) the practices employed by DFW are completely inconsistent with the historical (colonial) practices that created extensive open lands and thus are creating a novel form of artificial habitat; and (3) the creation and maintenance of these habitats decreases the extent of natural forest cover thus harming native biodiversity and reducing the carbon storage and climate mitigation potential of the state.*[8]

As the CFC report emphasizes (emphasis added):

> *The history of the Massachusetts landscape should be considered when establishing land management goals,* ***because current forest cover is significantly altered and very different from that found centuries ago.***[3, page 26]

We recognize that it is reasonable to conduct comprehensive, controlled research experiments related to early-successional habitats and species. However, In light of these factors, such experiments should be limited in scope and focused on lands that have existing open habitats [7][8], as described and discussed in the CFC report [3; page 29) (emphasis added):

- ***Assess the extent to which early successional habitat is or could be continuously created in all forested areas of the Commonwealth****, including public and private lands, as a result of ecological disturbances (e.g., extreme weather events, disease, pest infestations), potentially intensified by climate change, as well as by other management efforts (e.g., energy or transportation corridors). Then determine how much more state forest land should be dedicated to early successional habitat.* ***The proliferation of energy and transportation land uses and corridors and the shift away from the use of herbicides to maintain electrical transmission corridors has resulted in a great abundance of grassland, shrubland, and early successional forest that is actively maintained. Accounting for this large amount of habitat could reduce the need for early successional habitat on other forested land.***

- ***Reduce cutting of maturing forests to create early successional habitats to realize species regeneration and habitat goals****. Instead, designate recently harvested areas, including those cleared of plantations and areas disturbed by natural processes, as early successional habitat. This could reduce the number and area of additional early successional habitats required to meet the needs of the species they support.*

- ***Retain early successional habitat, rather than allow it to mature only to create it elsewhere****, where wildlife biologists indicate that this approach creates equivalent habitat.*

4. MassWildlife contends that its forest management projects are “carefully planned and implemented to create, restore, and maintain healthy habitats to increase biodiversity and climate resilience.” [1]

There may be many historical reasons for MassWildlife’s current land management strategies in the WMAs, which are heavily focused on creating early-successional habitat that expands populations of game and other favored wildlife species. But we request that the agency acknowledge and incorporate this conclusion of the Climate Forestry Committee:

> *Unsurprisingly, disturbing the forests of Massachusetts as little as possible and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health* .[3, page 4]

5. As noted above, each of the summaries of the projects includes a section titled “Climate Considerations,” which states:

This project was designed to ensure consistency with recommendations for climate-oriented forest management provided by the Climate Forestry Committee….

For each of the listed considerations that are claimed to be consistent with the CFC report, we contend that they are either inconsistent with the conclusions of the CFC report, or are scientifically controversial and were strongly argued against by members of the Committee. For example:

A. High Ridge WMA project summary: “select removal of overstory trees to promote a forest with diverse age classes, species composition, and structure that enhances overall forest resiliency”

The CFC report does not support this: “Some argued vociferously that the long history of forest change and recovery from historic changes in climate and natural and human disturbances indicate that little or nothing needs to be done to make forests more resilient.” [3, page 35]

B. High Ridge WMA project summary: “retention of specific trees that support biodiversity (e.g. large dead trees, cavity trees, diverse tree species mix)”

As noted above, the CFC report found that: “Unsurprisingly, disturbing the forests of Massachusetts as little as possible and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health.” [3, page 4]

C. High Ridge WMA project summary: “partial cutting via small group selection that will store carbon on the landscape for extended periods and improve growth and carbon sequestration rates on remaining trees”

The CFC report states that **“**The Committee generally agreed that passive management confers greater increases in carbon stocks than active, and that allowing forests to grow and age is typically best to maximize carbon storage.” [3, page 6]

D. Herman Covey WMA project summary: “tree thinning that will restore open woodland conditions and promote growth of native herbs, shrubs, and trees that are more resilient to drought and harmful insects”

Again, from the CFC report: “Some argued vociferously that the long history of forest change and recovery from historic changes in climate and natural and human disturbances indicate that little or nothing needs to be done to make forests more resilient.” [3, page 35]

E. Red Brook WMA project summary (emphasis added):

> ***Climate experts recommend*** *prioritizing and maintaining sensitive or at-risk species and habitat, with the expectation that pressure on these will only increase with changing climate. Ecological restoration of these sites*

***ensures continued habitat function and reduces climatic vulnerability**:*

- ***Reducing tree density** reduces vulnerability to pests like southern pine beetle and to drought stress.*
- ***Restoring native species** that are best adapted to the site promotes resilience to future drought, wildfire, and harmful insects.*
- ***Reintroducing low-intensity fire** promotes resilient native vegetation.*
- ***Removing heavy fuel loads** reduces vulnerability to wildfire.*
- ***Restoration** better positions these sites to adapt to climate change.*
- ***Restored sites are more reliable carbon sinks** in the long term than highly vulnerable dense fire-excluded forests.*

This is not consistent with the findings of the CFC report: “Unsurprisingly, disturbing the forests of Massachusetts as little as possible and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health.” [3, page 4]

F. Herman Covey WMA project summary: “restoring fire-influenced ecosystems that provide reliable carbon stocks currently and into the future as compared to fire-excluded forests vulnerable to severe and intense wildfires.”

The CFC report does not recommend “restoration” of “fire-influenced ecosystems,” nor does it conclude that prescribed fires are a net positive carbon advantage.

G. Menameset Habitat Restoration project summary: “thinning to prepare the site for the reintroduction of low-intensity prescribed fire to promote resilient native vegetation”

The CFC report does not recommend the use of prescribed fire.

H. Muddy Brook WMA project summary: “thinning to decrease tree density reducing vulnerability to wildfire, harmful insects, like the southern pine beetle, (and drought)”

The CFC did not make recommendations regarding thinning to reduce wildfire.

I. Muddy Brook WMA project summary: “restoring native species that are best adapted to the site promoting resilience to future drought, wildfire, and harmful insects”

The CFC report did not refer to management to promote resilience to wildfire.

J. Myles Standish Complex project summary: “thinning to prepare the site for the reintroduction of low-intensity fire to promote resilient native vegetation”

The CFC did not refer to the “reintroduction of fire.” References by MassWildlife to the “reintroduction of low-intensity fire“ suggest that such fires were historically common. There is little to no evidence that this was the case on any

substantial scale. In fact, there is significant evidence to the contrary. [7][8][9]. As the CFC report states:

> *The history of the Massachusetts landscape should be considered when establishing land management goals, because current forest cover is significantly altered and very different from that found centuries ago.*[3, page 26]

K. William Forward WMA product summary: “removal of conifer plantations and restoration actions designed to promote growth of native plants that are less vulnerable to pests, pathogens, invasive plants, and risks associated with drought, catastrophic wildfire, and other severe disturbances”

To reiterate this point from the CFC report (emphasis added:

> *Unsurprisingly, disturbing the forests of Massachusetts as little as possible* ***and allowing forests to grow and age through passive management is generally the best approach for maximizing carbon, ecological integrity, and soil health****.* [3, page 4]

In conclusion, we stress that these wildlife management area projects are experiments that should be carefully researched and planned, be implemented on a small scale, monitored for actual outcomes, and used to guide future management goals and practices. The CFC emphasized the importance of such an approach:

> ***The Committee found that there is an important role for further study and discussion on this topic****, including the timeframes and metrics being used to quantify resilience (i.e., is it important to address the resilience of the conditions society may desire from forests in the near-term, or to address long-term resilience of ecological processes that may include difficult state transitions and thresholds that are potentially less desirable from a short-term and human standpoint?).* ***Other important considerations include the role of experimentation, trials, and evaluation of resilience and adaptation strategies*** *(an activity undertaken by other states on public land).* [3, page 38]

We urge MassWildlife to adopt a policy of first, do no harm. This includes protecting all mature forests and allowing them to grow back and recover natural old-growth forest characteristics through proforestation.[7][12] We reiterate that there is no credible scientific evidence that any species requires the clearing of standing forests in Massachusetts to survive or thrive in its natural range, but ample evidence that such forest-clearing reduces long-term carbon sequestration and storage and can cause other significant negative environmental impacts. [7]

Additionally, we recommend that MassWildlife extend the comment period on these projects and increase public notification, outreach, and accountability. As mentioned, there was little public notice and most concerned citizens are unaware of the projects. The project summaries do not provide enough detail for the public to comment from a full understanding of the potential benefits and costs of each project.

Moreover, the responses by MassWildlife to the public comments that were submitted for the previous group of plans was not responsive to public questions and concerns. Instead of offering further documentation or explanation, or making any discernable changes in the draft plans, MassWildlife simply reiterated the agency's original positions. [5] We are concerned by this lack of responsiveness and accountability.

To reiterate:

- First and foremost, we are calling on MassWildlife to do no harm to our wildlife management areas by following the precautionary principal of taking no action when there is doubt about its advisability or support from the public.

- We urge the agency to end prescribed burning and other intensive management treatments intended to artificially expand or maintain early-successional habitats.

- We recommend that pine barrens restorations be treated as experiments that are focused on very limited areas, preceded by comprehensive biological surveys, and then followed by decades of monitoring and assessment to determine whether they are successful.

- We strongly encourage MassWildlife to open up public involvement in the forest management planning process by lengthening the comment period on these projects, increasing public notification, outreach, and accountability, and being transparent and responsive regarding how the agency considers and addresses public comments, suggestions, and concerns.

We look forward to the agency's substantive responses to our questions, concerns, and recommendations.

References

[1] Division of Fisheries and Wildlife (2025). MassWildlife's forest management projects (website) https://www.mass.gov/info-details/masswildlifes-forest-management-projects

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[3] Executive Office of Energy and Environmental Affairs (January 3, 2024). Report of the Climate Forestry Committee: Recommendations for Climate-Oriented Forest Management Guidelines. https://www.mass.gov/doc/forests-as-climate-solutions-climate-forestry-committee-report-final/download

[4] Division of Fisheries and Wildlife (2025) Quick Links (website) https://www.mass.gov/orgs/division-of-fisheries-and-wildlife

[5] Division of Fisheries and Wildlife (undated). MassWildlife's FY25 Forest Management Projects: Feedback Responses.

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[6] Division of Fisheries and Wildlife (2024). Upcoming MassWildlife prescribed fire locations (website) https://www.mass.gov/info-details/upcoming-masswildlife-prescribed-fire-locations

[7] Kellett et al. (2023). Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2022.1073677/full

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[10] John Muir Project. (2024) "Fuel Reduction" Logging Increases Wildfire Intensity and Puts Communities at Greater Risk. https://johnmuirproject.org/wp-content/uploads/2024/07/JMP-fact-sheet-thinning-and-fire-15July24.pdf

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[12] Moomaw et al, (2019). Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full

[13] William A. Patterson III and Andrew E. Backman (1984?) Myles Standish State Forest - From the Ice Age to the Present. Department of Forestry and Wildlife Management University of Massachusetts, Amherst. https://www.umass.edu/nebarrensfuels/publications/pdfs/Miles_Standish_paleo.pdf

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