



BACKCOUNTRY HUNTERS & ANGLERS

July 17, 2026

To Whom It May Concern:

The New England Chapter of Backcountry Hunters & Anglers (BHA) appreciates the opportunity to comment on MassWildlife's proposed upland habitat goals. We commend the agency's science-based approach to balancing open and mature forest habitats and recognize the critical role that active management plays in supporting wildlife diversity, particularly for game and non-game species that rely on early-successional habitats.

We offer the following feedback in the spirit of collaboration and shared stewardship:

- **General Support for Balanced Habitat Goals:** We support the proposed increase in grassland (2%) and shrubland (8%) targets, and the maintenance of a 10% young forest goal. These habitats are essential for numerous Species of Greatest Conservation Need, as well as for game species such as wild turkey, ruffed grouse, and white-tailed deer. The emphasis on creating a dynamic mosaic is sound conservation.
- **Support for Active Management, Including in Reserves:** We note the proposal to designate 20% of mature/maturing forests as Forest Reserves. While BHA generally views forest reserves within WMAs with caution, due to concerns about reduced habitat diversity, increased wildfire fuel loads, and diminished long-term public access for traditional recreation—we appreciate the explicit acknowledgment that **"some may require active management to support their continued growth, promote complexity, and maintain ecological services."** We strongly urge that this management flexibility be explicitly preserved, documented, and routinely exercised within reserves to address:
 - Wildlife habitat health (e.g., creating small canopy gaps for forage).
 - Public safety (e.g., hazardous fuel reduction near boundaries).
 - Infrastructure protection and access.
 - Control of invasive species, pests, or disease outbreaks. A "hands-off" designation must not become a barrier to necessary, ecologically beneficial stewardship.
- **Emphasis on Permanent Access and Hunter/Angler Engagement:** MassWildlife lands are a cornerstone of public access in New England. We request a clear commitment that habitat management—including within reserves—will **prioritize and never permanently**



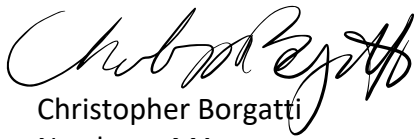
preclude public access for hunting, fishing, trapping, and wildlife observation.

Furthermore, we encourage MassWildlife to formally engage local BHA volunteers and other hunting/angling groups as partners in monitoring, maintenance, and outreach related to these habitat projects.

- **Clarification on “Managed in Place” for Young Forest:** The concept of maintaining 50% of young forest acres “in place” through recurring management is pragmatic for reducing the overall management footprint. We seek assurance that these recurring sites will be strategically located to maximize habitat connectivity and wildlife benefit, and that they will be actively monitored to ensure they continue to provide high-quality cover and forage.

Thank you for your work and consideration. We look forward to continuing to partner with MassWildlife to ensure our public lands remain productive, resilient, and accessible for generations to come.

Respectfully submitted,



Christopher Borgatti
Newbury, MA
Eastern Policy & Conservation Manager
Backcountry Hunters & Anglers