



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF THE DIRECTOR

235 Promenade Street, Room 425

Providence, Rhode Island 02908

March 31, 2026

The Honorable David A. Bennett
Chairman
House Committee on Environment and Natural Resources
82 Smith Street
Providence, Rhode Island 02903

RE: H 7914 An Act Relating to Agriculture and Forestry – Natural Forest Protection Act

Dear Chairman Bennett,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 7914, which would institute new restrictions on the management of forests. DEM is respectfully opposed to this legislation.

DEM recognizes the importance and benefits of a healthy forest ecosystem, including older and mature forests. However, we are concerned that this legislation would inhibit DEM's ability to effectively manage forests located on state property in a manner that benefits wildlife, recreational users, and the overall health of our forest ecosystem. DEM employs common and scientifically-backed forest management techniques, including thinning and prescribed fire, to accomplish goals such as the reduction of wildfire risk, creation of young forest habitat, and elimination of invasive species that threaten the native ecosystem.

H 7914 would prohibit the "felling or removal of any trees...for any purpose" and the use of forestry vehicles within designated natural area preserves and "even-age logging operations" on state property. The legislation provides exemptions from these prohibitions, such as for hazard trees and invasive species, but their use subject to the jurisdiction of the natural heritage program. It also introduces new requirements for proposed forest management activities, including tree removal and prescribed burns, to be reviewed by the natural heritage program before they may proceed.

In addition to the prohibitions introduced in the legislation, H 7914 also proposes the creation of a natural heritage program to be housed within the Rhode Island Historical Preservation and Heritage Commission. The coordinator of this program would be granted broad authority to inventory Rhode Island's forests, create a rare and endangered species list, designate natural

areas preserves, and oversee management activities occurring in state forests. The bill also designates 46 locations on state property located across Rhode Island as natural area preserves.

DEM objects to several elements of the proposed legislation because they would hinder our ability to effectively manage state forests and/or create duplicative and unnecessary parallel processes. DEM's forest management activities are based on established science and are implemented to achieve specific environmental or natural resource goals; they are never carried out to benefit the timber industry or for other economic reasons. By restricting DEM's ability to carry out forest management projects, the legislation would harm efforts to reduce wildfire risk, provide young forest habitat to vulnerable species such as the New England Cottontail, and increase the health and resilience of the state's forests.

Furthermore, the legislation would create a duplicative bureaucracy to oversee DEM's forest management activities and concentrate authority over state forests in the hands of a single coordinator. Notably, the bill would define the term "old growth forests" to mean what the coordinator decides that it means. This is duplicative of the work undertaken by the Forest Conservation Commission¹ created by legislation enacted in 2021 and provides the coordinator with enormous discretion to define a term that would be directly relevant to the management of the state's forests.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact TeeJay Boudreau, DEM Deputy Chief for Forest Environment, at teejay.boudreau@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in black ink that reads "Terrence Gray". The signature is written in a cursive, flowing style.

Terrence Gray, P.E.
Director

cc: Members of the House Committee on Environment and Natural Resources
The Honorable Evan Shanley
Nicole McCarty, Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director

¹ <https://dem.ri.gov/about-us/dem-offices/commissions-collaborations/rhode-island-forest-conservation-commission>