

CONGRESSIONAL
SPORTSMEN'S
FOUNDATION

To: Senate Committee on Environment and Agriculture

Re: Re: Senate Bill 3081; Old Growth Forest Protection

Position: Oppose

Date: March 25, 2026

Honorable Members of the Senate Committee on Environment and Agriculture,

On behalf of the Congressional Sportsmen's Foundation, thank you for the opportunity to provide input on Senate Bill 3081. I write to express our concerns with the legislation. The proposal to (1) prohibit “extractive logging” in old growth forests on state-owned land, municipality-owned land, and natural area preserves; (2) prohibit the use of clearcutting on state-owned land; and (3) create process notification and oversight requirements for “extractive logging” and prescribed burning on state-owned land and municipality-owned land over one acre in size would individually and cumulatively negatively impact forest health and wildlife habitat by prohibiting science-based forest stewardship. We therefore respectfully encourage you to table the legislation.

Founded in 1989, the Congressional Sportsmen’s Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen’s Caucus (CSC), the Governors Sportsmen’s Caucus (GSC), and the National Assembly of Sportsmen’s Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation’s conservation legacy.

Legislation Threatens Biological Diversity and Resiliency of Old Growth Forests

We recognize that old growth forests are underrepresented in the state and support goals to conserve them, however, we have concerns with the strict prohibition in the bill against “the felling or removal of any trees from a forest for any purpose” because it threatens biological diversity and limits the ability to improve forest resiliency.

Invasive species, insects, disease, and forest disturbances often warrant adaptive management intervention to improve forest stand vigor and treat threats that jeopardize biological diversity. The Rhode Island Forest Action Plan, in fact, lists several invasive species (i.e., gypsy moth, chestnut blight, Dutch elm disease, hemlock wooly adelgid, and emerald ash borer) that “can have

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evastating effects on forests.”¹ The Rhode Island Forest Action Plan also states that non-native invasive plants (e.g., multiflora rose, Japanese barberry, oriental bittersweet, glossy buckthorn, and Norway maple) can “reduce biodiversity and the wildlife that relies on them.”² The Rhode Island Forest Action Plan recommends controlling invasive species to promote forest health and resiliency, but Senate Bill 3081 prohibits silvicultural practices that would prevent the treatment of nonnative invasive species.

The exception provided in the legislation for invasive trees overlooks invasive insects, disease, and plants, and is too restrictive with the Natural Heritage Program determination and approval requirements. Science-based forest management is essential to creating resilient forests and supporting long-term forest health and removing management flexibility by prohibiting sustainable forest management practices in old growth forests would undermine the intent of the legislation to support old growth forests.

Legislation Overlooks Value of Early Successional Habitats Created by Clearcuts

Prohibiting clearcuts on state-owned land would remove an important tool for habitat management that is key to creating habitat diversity to support a greater diversity of wildlife. Clearcuts, despite a common misconception, are not inherently negative. Clearcuts are a well-established silvicultural method used to improve forest health, promote shade-intolerant species valuable to wildlife like black cherry, reduce stand entries to minimize impacts to soil and water resources, and enhance wildlife habitat by creating young forests and other early successional habitats.

Early successional habitats are critical for a wide range of wildlife species, including several Species of Greatest Conservation Need (SGCN) identified in the Rhode Island Wildlife Action Plan, such as the blue-winged warbler, chestnut-sided warbler, tree swallow, field sparrow, American woodcock, Eastern towhee, and ruffed grouse.³ Invertebrates, including the rusty-patched bumble bee and monarch butterfly, also depend on early successional habitats.⁴

Young forests and early successional habitats are in short supply in Rhode Island, and clearcuts are an effective way to create these important habitat components in the absence of natural disturbances, which the Rhode Island Wildlife Action Plan recognizes, “Wildlife managers cannot rely on natural disturbances to maintain or create enough shrubland habitat to support certain SGCN that require it. Therefore, anthropogenic methods are used to create and augment natural

¹ Rhode Island Forest Action Plan. 2020. Department of Environmental Management. Division of Forest Environment. <https://dem.ri.gov/sites/g/files/xkgbur861/files/programs/bnatres/forest/pdf/forest-action-plan/fap-p02.pdf>

² *Id.*

³ Rhode Island State Wildlife Action Plan. 2015. State of Rhode Island Department of Environmental Management. <https://dem.ri.gov/sites/g/files/xkgbur861/files/programs/bnatres/fishwild/swap/SGCNBirds.pdf>

⁴ Rhode Island State Wildlife Action Plan. 2015. State of Rhode Island Department of Environmental Management. <https://dem.ri.gov/sites/g/files/xkgbur861/files/programs/bnatres/fishwild/swap/SGCNInverts.pdf>

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shrublands.”⁵ The Rhode Island Forest Action Plan also states that the “lack of age class diversity...affects wildlife, particularly those species that depend on early successional habitat, such as the New England Cottontail.”⁶ The Rhode Island Forest Action Plan further notes that “natural disturbances...do not create early successional habitat on a regular basis to support SGCN wildlife species.”⁷

Legislation Limits Prescribed Fire Use to Improve Wildlife Habitat Management

In addition to our concerns about Senate Bill 3081 removing management flexibility to adapt and improve the resiliency of Rhode Island’s forests and our concerns about the lack of early successional habitats, the legislation’s notification and oversight requirements for forest management and prescribed burning on state-owned land and municipality-owned land over one acre in size would hinder the active management of forest resources to improve forest health and wildlife habitat. Prescribed fire is an important tool for improving forest stand conditions and wildlife habitat and reducing hazardous fuels to decrease severe wildfire risk, yet the legislation would limit its use.

Fire-adapted forests in Rhode Island benefit from regular, low-intensity fires that support regeneration, increase nutrient availability in the soil, control insects and disease, and manage competing vegetation, including non-native species. Prescribed burning enhances wildlife habitat for a range of nongame and game species, including wild turkey and White-tailed deer, by increasing vegetative diversity and the availability of forbs and grasses, improving cover, and creating diverse habitats across the landscape.

In closing, we respectfully encourage you to table Senate Bill 3081 to avoid creating barriers that limit sustainable management to improve forest health and wildlife habitat. Thank you for considering our comments.

Sincerely,



Fred Bird

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⁵ Rhode Island State Wildlife Action Plan. 2015. State of Rhode Island Department of Environmental Management. <https://dem.ri.gov/sites/g/files/xkgbur861/files/programs/bnatres/fishwild/swap/RIWAP-Chapter2.pdf>

⁶ Rhode Island Forest Action Plan. 2020. Department of Environmental Management. Division of Forest Environment. <https://dem.ri.gov/sites/g/files/xkgbur861/files/programs/bnatres/forest/pdf/forest-action-plan/fap-p02.pdf>

⁷ *Id.*

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