

CONGRESSIONAL
SPORTSMEN'S
FOUNDATION

To: The Honorable Ronald Mariano
Speaker, House of Representatives
General Court of Massachusetts

Re: House Bill 903 – Old Growth Forest Reserves Establishment
House Bill 953 – Forest Protection
House Bill 1048 – Increased Protection of Wildlife Management Areas
House Bill 5216 – Forest Protection

Position: Oppose

Date: March 30, 2026

On behalf of the Congressional Sportsmen's Foundation, I write to express our opposition to House Bill 903, House Bill 953, House Bill 1048, and House Bill 5216, which would restrict sustainable forest management, negatively impacting forest health, wildlife habitat, and access for sportsmen and women. We respectfully encourage you to table the bills.

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 Contravenes Intent of Wildlife Management Areas

We are strongly opposed to designating 30% of Wildlife Management Areas (WMAs) as Reserves where sustainable forest and wildlife habitat management would be prohibited. WMAs are purchased and/or managed with funding generated by Massachusetts' sportsmen and women, and WMAs provide important hunting and fishing opportunities for the public, particularly in a state with little public land like Massachusetts. As reported by the U.S. Fish and Wildlife Service for 2025, Massachusetts' sportsmen and women generated more than \$24.2 million for conservation funding, supporting the Massachusetts Department of Game and Fish through the "user pays – public benefits" American System of Conservation Funding.¹ Prohibiting forest management, including prohibiting the creation of wildlife openings and early successional habitat, converts WMAs to de facto state parks and undermines the intent of WMAs.

Legislation Threatens Biological Diversity and Forest Resiliency

¹ Massachusetts: American System of Conservation Funding Fact Sheet. 2025. Congressional Sportsmen's Foundation. <https://congressionalsportsmen.org/wp-content/uploads/2025/07/Massachusetts-ASCF-Fact-Sheet.pdf>

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We support goals to conserve old growth forests, but we have concerns with the moratorium on timber sales on public lands and the prohibitions against active forest management because they threaten biological diversity and limit 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 Massachusetts Forest Action Plan (FAP) lists several invasive pests and diseases (i.e., gypsy moth, chestnut blight, Dutch elm disease, beech bark disease, hemlock woolly adelgid, and emerald ash borer) that “have a significant impact on the forest...and cause mortality across many acres of mature trees.”² The FAP also states that exotic invasive plants (e.g., kudzu, princess tree, multiflora rose, tree of heaven, and Japanese stilt-grass) can “threaten biodiversity by out-competing native plants, causing declines in native plant populations, and consequently, altering established ecosystems and the habitat they provide.”³ The FAP recommends controlling invasive species to promote forest health and resiliency, but the legislation limits silvicultural practices recommended in the FAP to treat nonnative invasive species.

The exception provided for invasive species management is too restrictive. 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 undermines the intent of the legislation to support old growth and other forests.

Legislation Neglects Value of Young Forests and Early Successional Habitats for Wildlife

Prohibiting forest management is short-sighted because it removes important tools for habitat management that are key to creating habitat diversity to support a greater diversity of wildlife. Harvesting timber, despite a common misconception, is not inherently negative. Forest management uses well-established silvicultural methods to improve forest health, promote shade-intolerant species valuable to wildlife, reduce stand entries to minimize impacts to soil and water resources, and enhance wildlife habitat by creating young forests and other early successional habitats.

The other least common forest habitat type in Massachusetts is young forests, which are critical for supporting a wide range of wildlife species, including several Species of Greatest Conservation Need. As the Massachusetts’ 2015 Wildlife Action Plan stressed, young forests and other early seral habitats are important for the prairie warbler, Eastern towhee, brown thrasher, moose, black bear, bobcat, ruffed grouse, American woodcock, and New England cottontail, among others, during important stages of their life cycles.⁴ Older forests alone do not provide the

² Massachusetts Forest Action. 2020. Massachusetts Bureau of Forest Fire Control and Forestry, Department of Conservation and Recreation, Executive Office of Energy and Environmental Affairs. <https://www.mass.gov/info-details/massachusetts-forest-action-plan>

³ *Id.*

⁴ Massachusetts Wildlife Action Plan. 2015. Massachusetts Division of Fisheries and Wildlife, Department of Fish and Game, Executive Office of Energy and Environmental Affairs. <https://www.mass.gov/info-details/state-wildlife-action-plan-swap>

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habitat diversity to support these species, and we therefore encourage you to consider the effect that these bills would have on the species that benefit from disturbance and the habitat created through science-based sustainable forestry, which would be prohibited in old growth forest reserves, including the “buffer areas,” not just the old growth forest stands themselves.

Legislation Creates Management Ambiguity

We are concerned with the discretion that the legislation provides to designate buffer areas around old growth stands where active forest management practices are prohibited. One, the concept of a buffer area to “mitigate the effects of natural disturbances” misses the point since one of the primary characteristics of old growth forests is that they are dynamic and have a complex stand structure influenced by natural disturbances. Two, the buffer area definition is subjective and provides little guidance regarding how big a buffer area should be (e.g., distance from the edge of an old growth forest stand, total acreage, etc.) apart from “sufficient size and configuration.” Three, it is critically important for a range of forest age classes and habitats to be represented across the landscape to enhance biodiversity and support a wider range of wildlife species, and we are concerned that forest managers will not be able to create habitat diversity for wildlife because of the lack of clarity and potential overreach when designating buffer areas.

Legislation Threatens Fishing and Hunting Access

We are strongly opposed to the provision that would allow fishing and hunting to be restricted or prohibited in old growth forest reserves (old growth forest plus buffer area). We are not aware of any situation across the country and cannot think of an example of how fishing or hunting would negatively impact the protection and management of old growth forests, let alone stands that are not old growth forests. The “suitable” standard in the bill is vague and opens the door for capricious decision-making that could bar anglers and hunters from accessing public land.

In closing, we respectfully encourage you to table House Bill 903, House Bill 953, House Bill 1048, and House Bill 5216 to support the integrity of WMAs and to maintain the ability to adapt and sustainably manage forests to increase their resilience and improve habitat for wildlife. Thank you for considering our comments, and please let us know if you have questions or would like additional information.

Sincerely,



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