

Terrance Gray, Director
RI Department of Environmental Management

May 7, 2026

Dear Director Gray,

In an October 6, 2025 letter to Senator Mark McKenney, I urged caution in conducting the logging project then scheduled for the Great Swamp Management Area. I stated:

It would be incumbent on DEM to postpone the Great Swamp project until an environmental assessment is conducted to provide a cost/benefit analysis, and until the TNC/DEM forest management plan is completed. There is absolutely no urgency to the Great Swamp project, and plenty of time to get it right.

That advice was ignored and the project was completed. Two weeks ago, I visited the Great Swamp and observed the logging site. Attached to this letter are several photographs showing the aftermath of the project. As you view these photos, think about the following:

1. Does this project look like one that the State of Rhode Island would be proud to display as a demonstration of how to build forest resilience to climate change?
2. Is this project biodiversity-friendly and one the State of Rhode Island would proudly display as a good way to address the biodiversity crisis?
3. Is this a project the State of Rhode Island wants to have happen on all of its forested properties?

If your answer to any of these questions is “No”, then why did you allow
the project to proceed before concerns raised by the public were addressed?

The biodiversity crisis is a matter of global concern, but it remains unrecognized by Federal and State governments. The Director of DEM has plenty to worry about regarding environmental regulation and must rely

on advice from the Bureau of Natural Resources when issues arise, such as the Great Swamp project.

However, government does recognize the climate crisis, and it is disturbing that the Chairman of the Climate Coordinating Council can be so easily convinced swayed by the natural resource professionals at DEM that logging a 32-acre forest for a single wildlife species is an acceptable trade-off to leaving the forest standing to sequester and store carbon.

The public is continually outraged by instances of trees being cut for dubious reasons. Solar arrays, data centers, urban woodlands needlessly cut. But when the logging is done on public land the public is duped into believing that such projects are “good for wildlife” and “helps the forest be more resilient to climate change and invasive pests.”

There’s an old adage that starts, “If it sounds too good to true....?”

Again, I would ask you to view the photos and ask, is this a climate-friendly project? What have they told you about the climate impacts from this project? The loss of carbon sequestration and storage capacity, disruption of soil and release of carbon, emissions from logging equipment, creation of ideal conditions for proliferation of invasive plants.

None of these impacts were addressed in an environmental assessment for public review and comment. There were no opportunities for the public to learn about the project, no process for soliciting comments. It is my understanding the public did not learn about the Great Swamp project until signs were posted at the entrance gate only weeks before the project commenced.

Regarding biodiversity, the information you receive from the Division of Fish and Wildlife on this subject is pathetically feeble. Unlike the data scrutiny and professionalism of the climate scientists at DEM, DFW is only interested in wildlife, the commodities of biodiversity. Similarly, a forester’s main concern is the commodities of the forest, trees. What wildlife managers and foresters are not interested in is the forest as an ecosystem that supports thousands of other, non-commodity species.

The commodities of biodiversity demand and get the attention, while the communities, the forests and other ecosystems, are manipulated for the maximum yield of the commodities. As foresters often tell wildlife managers, “just tell me what you want it to look like, and I’ll make it for ya.”

The Great Swamp project has once again brought to light the need for long-term management planning of state management areas. In this regard, here are comments by Ryan Mulcahey, Director of Legislative Affairs at DEM, in an email to Senator McKenney:

*DEM is partnering with The Nature Conservancy **to complete forest management plans for the properties that we manage.** Those plans, once finalized, will be extremely useful in guiding decisions about the use of these properties. **DEM is exploring options** for providing the public with opportunities to provide feedback on the development of these plans.*

Also, in a message sent by the Forest Conservation Commission reporting on their April 2nd meeting:

*We spent time discussing the Natural Area Preserves (sic) Act and how it can be applied.....There is a clear pathway to designating state-owned lands following the completion of the forest inventories tied to the 14 upcoming **Forest Management Plans on state properties.***

These statements imply a misunderstanding about the process of preparing management plans. For example, suggesting that forest inventories should be used to govern how state lands are managed implies that timber harvesting will take precedence over all of other values. Second, and most disturbing, is the suggestion that DEM isn’t quite sure how to deal with public feedback, that they are “exploring options.”

I’m sure DEM’s legal team will be able to advise you on the correct procedures to follow for preparing management plans on state-owned lands. During my tenure at DEM, I served as the point person for the Open Space program, and one of my tasks was reviewing management plans that were required of all grant recipients. The structure of those management plans was detailed in the Rules and Regulations governing the administration of the Natural Heritage Preservation Act, the Act that

also created the Natural Heritage Preservation Commission. The writing of those Rules required a public comment period and public hearing.

In short, I believe the correct procedure is to promulgate Rules for preparing management plans first, then write individual plans that would also require public review and a public hearing. Writing management plans for public land should be a rigorous and open process. A proposed plan for forest management is only one piece of a full management plan – only one of the public values that should be addressed.

For example, in addition to its biodiversity significance, the Great Swamp Management Area is an important historic site as the location of the Great Swamp Fight of 1675. The location of the fight is known to be on the high ground of Great Neck where most of the habitat manipulation projects have taken place. This location obviously holds great significance to the Narragansett Tribes, and it is important to insure representation of the Tribe in the Rule-making and plan-writing process.

Lastly, I would be remiss not to address Ryan Mulcahey's letter, first recognizing that it was sent in response to a request from Senator McKenney, who wrote:

*I am still getting pressed by others, who appear to be aligned with Mr. Cornell in their view that this is not proper action for DEM to be taking. They're also questioning the lack of oversight of these activities. **This is prompting me, as Chair of the Senate Oversight Committee, to take another look at the complaints. I will send along the additional opinions that I've received on the subject. I'd appreciate your further response.***

One of the additional opinions that Senator McKenney refers to is mine, and it is important for me to address the disinformation given by Mr. Mulcahey in the following statements.

- 1. The state's forests lack age-class diversity, meaning that the vast majority of forests are 40 to 80 years old. Only 2% of the state's trees were found to be 20 years or younger which indicates a severe shortage of early successional habitat.*

Early successional habitat is essentially any vegetated place that is not forest. In its earliest stage it is the 32 acres of bare ground created last fall in the Great Swamp. For the next 15 years this site will change from grassland, to shrubland, to sapling forest, each stage providing habitat for a unique set of early successional species. But, with the passage of 20 or so years the young forest becomes less valuable for the target wildlife species, and the site will be “managed” again, this time with a brontosaurus. In other words, this 32 acres of forest will never be allowed to restore itself under the current management paradigm.

- 2. Rhode Island has had few stand replacing events over the last several decades which has led to the gradual aging of the state's forests even after considering for projects like the above.*

Allowing Rhode Island's remaining forests to age is the most logical response to the climate and biodiversity crises. Why does Rhode Island consider the aging of forests to be a bad thing?

- 3. While old forests which are 100 years or older can be created by simply leaving them alone, young forest typically requires management intervention. To provide context, DEM's Great Swamp project is occurring on a 32-acre portion of the approximately 57,000 acres of forest managed by DEM or the approximately 350,000 total acres of forest in the state.*

This is an incredibly stupid statement. The suggestion that 32 acres in the Great Swamp is just a small portion of DEM land, and moreover of the state's entire forest landscape, and therefore too small to worry about, is appalling. If it has not been made clear by now, the Great Swamp is not just another place. It is the state's most significant natural place.

- 4. Despite some claims, large-scale harvests are not occurring on state land and to the extent that tree removal is occurring it is most often to remove dead or dying trees or invasive species, for fire prevention purposes, or to create wildlife habitat.*

To the contrary, harvests are being conducted on most of the state management areas. The DEM web page on state land forest management lists all projects conducted on MAs for the last ten years. Included are 13 projects conducted on 8 management areas, with a total of 675 acres logged. That's more acres logged on state management areas in the last ten years than in the prior 50.

And it is definitely disingenuous to suggest that tree removal can be considered a solution for "removing" invasive species. One of the reasons that invasive plants, especially autumn olive, multiflora rose, and barberry, are overrunning the state's management areas is because most of these plants were originally introduced by fish and wildlife managers to provide wildlife food and cover. Then, they continue to cut trees and create acres of bare ground for invasives to spread. Logging, for any purpose, exacerbates the invasive problem.

5. *DEM foresters will selectively thin the forest area by marking individual trees to be removed (typically, but not exclusively, those that are diseased, dying, etc.) consistent with forest science, while retaining many other adult trees to retain a mature tree canopy.*

The photos show this operation was actually a clearcut with retention. Dead or dying trees should have been retained or left on ground. It is clear that most of the trees were removed from the site suggesting that most of the trees were not diseased or dying. The evidence of 95+ year-old tree stumps and the large landing area suggest this project was also conducted for the lumber resource. This should raise questions about how this project was funded, and more importantly who reaped the economic benefit of the product, at the expense of carbon sequestration and storage.

According to the DEM web site, on a page describing state land forest management, is the following:

DEM foresters supervise and monitor the harvest operations. All salvaged trees are strategically selected and marked with blue paint. Tree harvesting is performed by Rhode Island registered wood operators who bid on the project; harvested trees are often used for wood chips, mulch, and firewood.

One-hundred-year-old trees are not harvested for wood chips, mulch, or firewood.

The disinformation in Mulcahey's letter is the same drivel that DEM has been feeding the public and legislature for years. Usually, it just comes in the form of unsolicited objection letters to proposed legislation that would curb DEM's activities on State land. But Mulcahey's letter was sent by specific request from the Senate Oversight Committee.

A piece of advice. Next time DEM receives a request from the legislature you might want to consider having your professionals provide the answers, and not some lackey whose main job seems to be obfuscating the issue to keep the legislature off DEM's back.

Have a nice day.

Rick Enser, former Coordinator
RI Natural Heritage Program

CC: Senator Mark McKenney
Representative David A. Bennett
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