



STATE OF CONNECTICUT
COUNCIL ON ENVIRONMENTAL QUALITY

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Peter Hearn
Executive Director

March 25, 2022

To: deep.hazardtrees@ct.gov

Re: Response to DEEP's request for comment on its development of a policy for hazard tree mitigation.

The Council on Environmental Quality (Council) commends the Department of Energy and Environmental Protection (DEEP) for [seeking](#) input related to its development of a policy for the maintenance of trees on DEEP-managed properties. The Council also acknowledges DEEP's effort through its 2018 Hazard Tree Inventory process to "augment the agency's ability to minimize risk to the public associated with the increase in damaged, diseased, and dead trees in high-use areas". That process relied on parks' personnel to implement a decision-making rubric to identify hazard trees. Its shortcomings appear to have resulted in DEEP's current announcement of its intent to develop an improved policy that will guide tree removals in the future.

It is the Council's [assessment](#) that non-emergency state actions that affect the state's forests and parklands are "actions which may significantly affect the environment", as described in the Connecticut Environmental Policy Act (CEPA) ([CGS Sec. 22a-1c](#)) and its regulations, and must comply with CEPA's provisions. CEPA allows for state agencies to establish thresholds for environmental reviews. If DEEP creates an agency-specific Environmental Classification Document (ECD), the new policy may serve as the basis in its ECD for evaluating whether a tree removal action requires a review under CEPA.

The development of a hazard tree removal protocol will need to consider the points that are discussed below.

1. Public safety is the overriding concern that must take precedence over economic and ecological considerations, and removal of trees is not the only way to protect the public.

For living trees, a determination about which are in need of attention and what methods are appropriate to reduce public risk requires the expertise of someone trained to make such assessments. Members of the public and some legislators have urged the employ of arborists with training in hazard tree identification. While existing park personnel can identify trees that are suspect of being a hazard, the final determination regarding whether they pose a substantial risk and what method should be employed to eliminate the risk should be the responsibility of an expert with the appropriate training.

When evaluating a potentially hazardous tree, consideration should be given to trimming or cabling as an alternative to removal of a tree at locations where a tree has high social value or serves a unique ecological role. While awaiting a determination by a qualified expert, rerouting traffic or closing off public access or redesigning use areas can prevent injury to persons and property.

2. The nature and intensity of public use should be determinative of tree management, not the category of state land ownership in which it is held.

Currently, tree management protocols are different for parks and for forests. This distinction is based, partially on the presumption that parks and campgrounds receive high visitation while forests do not. The reality is that there are forest sections that receive significant traffic due to their proximity to high population areas or to their unique attributes that attract visitors. Evidence of this was seen at Massacoe State Forest where area residents [opposed](#) the cutting of a section that was a popular hiking and visitation area. Forest sections like that require the same guidelines as are applied to parks and campgrounds. Intensity of use must be considered in determining how to manage the state's wooded lands, rather than whether they are categorized as forest or park, or have dense or sparse tree cover.

3. Hazard trees that must be removed in an emergency action need to be differentiated from removals that are part of routine maintenance.

Multiple state statutes exempt emergency actions from some of the permitting and regulatory requirements that might apply to the same actions in non-emergency circumstances. "Emergencies" can be recognized by their imminence and urgency. As referenced previously, the Council has issued a [paper](#) explaining why the state's tree removal actions must be subject to the planning process that is laid out in the CEPA law. However, CEPA exempts "emergency measures undertaken in response to an immediate threat to public health or safety". Consequently, emergency tree removals need to be narrowly defined to distinguish them from the routine maintenance that the public expects to protect its safety and to preserve the scenic and ecological values of the state's wooded lands. This distinction is important because the tree removal action that led to the [protests](#) at Housatonic Meadows State Park was justified by DEEP as an "emergency action", despite it being years in planning and execution and involving 18,000 trees statewide.

The removal of stands of infested, diseased or fire-damaged trees may, or may not, be an "emergency". Two factors can be used to define whether the removal is a consequence of a CEPA-exempt emergency: a) does the area require cordoning off of public access until the work is done, and b) the duration of the operation. These definitional distinctions will be useful in designing a coherent tree removal policy, as described below.

a) Restriction of public access:

The clearest and most utilitarian distinction between an emergency removal of a "hazard" and a maintenance activity is whether the area near the tree(s) required restricting public access to reduce risk until the tree(s) could be trimmed or removed. In cases where large stands have been destroyed as a consequence of a natural disaster, risks to persons and property have been reduced by closures or partial closures, as [happened](#) in 2018 after storm damage to state parks, while hazard trees were being removed. In cases where sequestration is not required, the designation of an "emergency" is questionable.

b) Duration:

The duration of the operation is an additional differentiator between emergency and non-emergency operations. Tree removals that transpire over multiple months or years are most correctly described as "maintenance", since there will always be diseased and damaged trees in need of assessment and, possibly, removal.

Tree removals that involve inspections and trimming or felling over multiple months or years and do not also deny or restrict public access to the subject area prior to the removal are maintenance. They are not emergencies, regardless of their scale.

4. Guidelines already exist in CEPA and in other state planning documents, laws and regulations for what should be taken into account in developing a protocol for removing hazard trees.

For its forestry actions, DEEP requires that there be plans that consider a number of environmental factors. The state's non-emergency maintenance of trees at the state's parks, campgrounds and forests with high visitation could be governed by those same considerations. Forestry plans must include provisions to prevent erosion, to identify and protect endangered species, to remove invasive species and prevent their reemergence, and to protect wetlands, watercourses and riparian corridors. Those factors are not sufficient to address all the

considerations that should be taken into account when planning tree maintenance in areas of high visitation.

Other aspects that should be considered in developing criteria for removing trees are listed in the [Regulations](#) of Connecticut State Agencies (RCSA) governing actions that are subject to CEPA: “an agency shall: (1) Consider the direct, indirect, and cumulative effects of an action ... and assess the setting, duration, irreversibility, controllability, geographic scope, and magnitude of those effects as the potential or actual consequences of an action.” The regulations add “... an agency shall consider direct and indirect effects of an action, including but not limited to... (5) Effect on natural communities and upon critical plant and animal species and their habitat; interference with the movement of any resident or migratory fish or wildlife species... (7) Substantial aesthetic or visual effects... (16) Effect on existing land resources and landscapes... (19) Effect on greenhouse gas emissions as a direct or indirect result of the action; (20) Effect of a changing climate on the action, including any resiliency measures incorporated into the action; and (21) Any other substantial effect on natural, cultural, recreational, or scenic resources.”

Public notice and public input are additional and essential components that have proven to be crucial for hazard tree removals. In Connecticut, forestry plans [typically](#) include provision of notice of anticipated actions via informational signage and by contact with local elected officials. More can be done in this regard. If non-emergency hazard tree removals were vetted through the CEPA process, they would benefit from improved public notice and public input. In the CEPA process an agency decides, based on its ECD, whether the action warrants a “Scoping Notice”. If yes, it posts a “notice of public scoping” to the state’s Environmental Monitor which is sent to every municipality in the state and is subscribed to by many non-governmental organizations and by multiple state agencies, including Divisions inside DEEP that may be unaware of plans about which they might have an interest. CEPA allows for a public hearing when 25 people or an organization representing at least 25 people request it. A thirty-day period is allowed for the agency to receive input from experts and potentially effected citizens. The agency reviews the comments received and must respond to the input received. The agency may then proceed with the action or modify it as appropriate.

The Council believes that the combination of public notice actions listed above, especially the use of notice through the Environmental Monitor, as prescribed in CEPA is the optimal approach to keeping the public informed of non-emergency tree removal actions.

Thank you for considering these comments.

Sincerely

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and is positioned above the printed name and title.

Peter Hearn,
Executive Director

From: [Jeannine Gluck](#)
To: [DEEP Hazard Trees](#)
Cc: [Emery Gluck](#)
Subject: Comments for DEEP's hazard tree mitigation policy
Date: Sunday, March 27, 2022 8:49:34 PM

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

I am writing to provide comments on the development of DEEP's Hazard Tree Mitigation Policy. My comments are based on my 41 years of experience as a forester.

The high number of hazard trees (over 18,000 on DEEP land), the death of a visitor to Salmon River State Forest and injuring of another by a falling tree, and a greater number of hazard trees almost sure to develop necessitates a robust hazard tree policy that allows a timely and fully adequate response. Even though a tree or branch striking a public user or employee has been extremely infrequent, it is often irreparable and/ or deadly. These are low frequency, high consequence events whose risks can be minimized with effective, common sense, and easy to implement management and policy where public safety is the overriding factor.

Most of the hazard trees are dead oaks that have only started to drop their substantial branches. Many additional hazard trees can be expected to develop as the forest starts to senesce, tree decline becomes apparent (trees often take up to 10 years to die), and additional stressors (drought, invasive insects, disease, and storm damage) become more frequent and take their toll. The increasing use of DEEP land by the public and probable increasing number of hazard trees will escalate the risk.

Trained DEEP employees should continue to be able to designate dead trees, structural compromised trees and dying trees (trees with an estimated 50% of branches being dead, subnormal foliage density, smaller than normal foliage and/or chlorotic foliage) within striking distance of a target as hazard trees.

Since hazard trees will eventually fall eventually by themselves, the act of manually felling hazard trees when there are no chips blown into the woods or no equipment operating off road, should be allowed without additional permission or not necessitate the current environmental review. This minimal type of hazard tree mitigation has essentially no more impact than when trees fall over by themselves. Since no environmental review is needed for a tree felled by nature, none should be necessary for minimal hazard tree mitigation. Unnecessarily using staff time for environmental reviews, reduces the numbers of hazard trees that can be mitigated (thereby compromising public safety) and other important ecosystem restoration work done. Hazard tree numbers will likely climb with the current limited pace of removals.

Arborists should be utilized to determine if live trees in highly utilized non-forest settings are hazardous and if there are cost-effective interventions that can remedy the situation. The arborist should be a DEEP employee to prevent the possibility of conflict of interest. Some treatments are annual and could be very cost prohibitive. Multiple assessment could be needed over the years as trees can show major decline in health years after a defoliation or drought. OPM should do a financial analysis if Senate Bill 117 passes and requires a private arborist for each state park. The analysis should determine how many hazard trees will not be addressed if the funding is diverted to a contract arborist.

Posting should be done at a kiosk, DEEP web site, and or a sign on a nearby non-hazardous tree. Posting on the hazard tree endangers the employee doing the posting and the public reading it. The posting should notify the public of the dangers the marked tree poses and to stay away from underneath its dead branches. If DEEP decides to post individual hazard trees, it should use "KILLER TREE" tape to warn the public of the peril of being near these trees.

Killer.jpg



Though not an emergency, it is imperative the hazard trees be dealt promptly. I strongly disagree with CEQ's position that they can be done as part of regular maintenance (DEEP does not do regular tree maintenance) and unsafe areas could be cordoned off in the interim, instead. This is a tactic that almost always fails as someone nearly always destroys or steals barricades, rip down signs and caution flagging leaving the general public unaware that there is a hazardous situation ahead. Also, there are too many areas and individual trees that are hazardous to cordon them all off.

DEEP should compare its hazard tree policy with other states' policy. It should be no more restrictive than other states'.

The policy should emphasize public safety, not downplay it..

Thank you.

Emery Gluck, Lebanon

March 29, 2022

To:

**The Connecticut Department of Energy and Environmental Protection
79 Elm St.
Hartford, CT 06106-5127**

From:

**The Berkshire-Litchfield Environmental Council (BLEC)
P.O. Box 668
North Canaan, CT 06018**

BLEC Correspondence to:

**Starling W. Childs, President
109 Litchfield Road
Norfolk, CT 06058
eecostar@gmail.com**

B. Blake Levitt, Communications Director

**355 Lake Road
Warren, CT 06777
blakelevit@cs.com**

Re: Hazardous Tree Mitigation Policy

Comments submitted electronically to: deep.hazardtrees@ct.gov

Dear Department of Energy and Environmental Protection,

The below written comments, submitted by The Berkshire-Litchfield Environmental Council (BLEC), follow our participation via ZOOM in the public meeting that was held on March 15, 2022, regarding DEEP's development of a new Hazardous Tree Mitigation Policy. This is being done in response to public/legislative concern after the recent over-cut of healthy trees in the Housatonic Meadows State Park in Sharon, CT, at the discretion of the park manager.

The Berkshire-Litchfield Environmental Council is a 501 (3)(c) non-profit organization that focuses on environmental issues affecting the Northwest Corner of Connecticut and the Berkshires region of Massachusetts. BLEC addresses diverse environmental subjects, such as a proposed/failed hydroelectric pumped storage power plant, water and air contamination, land preservation, zoning controls, vernal pools protection, the environmental effects of radio frequency radiation associated with the siting of telecommunications infrastructure and the ‘smart’ grid, and inland industrial-scale wind turbines. Our focus is historically on the environmental effects of infrastructure with an eye toward improving government procedures and policies at the local, state, and federal levels. Founded in 1970, BLEC holds educational forums on emerging environmental issues with speakers from federal agencies and researchers from around the world.

BLEC is heartened by DEEP’s quick and constructive response to the significant public concern after the too-zealous tree cutting at the Housatonic Meadows State Park in Sharon, CT, during the winter of 2021-2022. To all who witnessed that event over several days, it was clear that there are procedural and/or review problems within DEEP’s process. We welcome the opportunity to comment along with so very many qualified others in this part of the state.

While there is excellent local private expertise now cooperating with DEEP over delineating remediation efforts, BLEC’s concerns are more structural regarding DEEP’s internal review process from which many of the problems of that day appear to originate. We are particularly concerned that DEEP not go for just the “low hanging fruit” of better PR communications with localities when hazardous cuts are to be conducted. DEEP’s Forestry Department has long done an excellent job of including municipalities in all stages of their projects. The structure for applying that same approach already exists with DEEP and perhaps can be adapted to also apply to the Parks Division under hazardous tree operations.

BLEC is more concerned with how and why the Parks Division, under the umbrella of hazardous tree removal, appears to have crossed into a larger scale marking of healthy trees that would normally be under Forestry’s purview. We are particularly concerned that a tree cut of this scale, in a clearly sensitive river environment, does not appear to have taken into consideration trees as significant habitat for other species or as part of a larger ecosystem.

Craig Miner, the state senator for this area, requested a DEEP FOIA on this subject that resulted in over 600 pages of documents. BLEC read them all and the picture that emerged was disturbing – especially the fact that a sole parks manager had the ability to mark for take-down many healthy trees and commence a significant cut without consulting DEEP’s own Natural Diversity Data Base (NDDDB) where it is clearly noted that bald eagles exist at that exact site. (Bald eagles are on the threatened state list.) That is a local well-known bald eagle nesting/fishing area close to DEEP’s own trout stocking site as revealed in the FOIA. There appears to be year-round nesting there now, as well as returning migratory eagles as often seen in January migrations here, this year included. These facts were also known to the parks manager who was captured on video the day of the cut observing, along with activists, the disturbed behaviors of several eagles frantically flying overhead. That disturbed behavior was witnessed and documented by local for weeks after the cutting events. This is not only against state law, it is also against federal law.

To BLEC, all this demonstrates issues larger than PR and after-the-fact site remediation.

BLEC respectfully asks DEEP to review the internal communications processes between departments, clarify what extra reviews/inclusions are needed under the new Hazardous Tree Mitigation Policy, and mitigate as needed according to the following concerns resulting from the Housatonic Meadows episode and the below accompanying questions:

- What protocols exist between the Parks and Forestry Departments to communicate, with the latter reviewing/signing-off on recommendations before cuts begin?
- What protocols are in place to require in every instance the review of the state NDDDB before cuts commence?
- What, if any, training exists throughout DEEP Departments for all in-field personnel to understand and abide by not only state laws but also federal laws regarding wildlife protection? As DEEP knows, there are strict liability statutes that protect endangered and migratory species that supersede the state. Such is the case with Housatonic Meadows. Although bald eagles are no longer on the federal endangered list, they are nevertheless protected

under the Bald and Golden Eagle Protection Act (BGEPA) which requires consultation with the U.S. Fish and Wildlife Service before any action that could be considered a ‘take’ is involved. The BGEPA includes provisions against pursuit, shooting, poisoning, capturing, killing, trapping, collecting, molesting, and disturbing both species, as well as prohibiting takes as defined under the Migratory Bird Treaty Act as: to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. What occurred at Housatonic Meadows could be considered an illegal “disturbance take.”

- Any DEEP personnel in a decision-making position needs to understand their larger role to abide by federal laws, and stop-work provisions should be in place when any endangered, threatened or species of special concern are located – as noted on both state and federal lists.
- To avoid a recurrence of what occurred at Housatonic Meadows, please require the Parks division to consult and get sign-off from both the Forestry and Wildlife divisions within DEEP since trees are only one aspect of whole ecosystems.
- BLEC supports The Council on Environmental Quality’s recommendations in their recent white paper that DEEP follow the review process under the CT Environmental Policy Act (CEPA). <https://portal.ct.gov/-/media/CEQ/Publications/2022/CEPA---Forestry--white-paper-2242022.pdf>

BLEC – and many in Litchfield County -- are appreciative of DEEP’s efforts to engage the public on more effective environmental protection. We look forward to DEEP’s final policy changes and sincerely hope the scope has the broad ecosystem focus that is warranted.

Respectfully Submitted for The Berkshire-Litchfield Environmental Council,

Starling W. Childs, President

B. Blake Levitt, Communications Director

From: [Tom Zetterstrom](#)
To: [DEEP Hazard Trees](#)
Cc: [Trumble, Mason](#); [Goclowski, Matthew R](#)
Subject: Hazard Tree Assessment recommendations for State Parks.
Date: Tuesday, March 29, 2022 1:24:17 PM

EXTERNAL EMAIL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

To DEEP

The Heritage oaks at Housatonic Meadows SP should have been evaluated by a licensed arborist or consulting arborist to determine structural defects and quantify each tree's hazard risks with use of a sonic decay detection device and other evaluation criteria. Certain trees might have deserved removal, but others might have only needed crown balancing, or reduction or removal of certain leaders, or perhaps cabling. This project should not have been assigned to a forester's judgement alone, but deserved a higher level of deliberation with Hazard Tree Assessment Qualified arborists incorporating several disciplines.

My position was presented in brief comments at the January 6th DEEP Public Meeting. I also agree with comments by Kent Tree Warden and arborist Bruce Bennett on March 15 encouraging DEEP to engage licensed arborists with International Society of Arboriculture (ISA) "hazard tree assessment qualifications" as the arbiters of DEEP-designated "hazard trees." (<https://www.cga.ct.gov/2022/ENVdata/Tmy/2022SB-00117-R000225-Tree%20Warden-Kent,%20Connecticut-TMY.PDF>). Qualified arborists could either be on DEEP staff or could be hired on a consulting/contracting basis to service several parks or a region.

In addition, invasive shrubs and vines that are known to turn healthy forests and trees into hazard trees should be managed (cut and treated) before any harvest of trees, whether hazardous or not. Followup invasive control should continue for two years after tree removals.

Tom Zetterstrom

Canaan, CT

860 824-7604

(By way of tree credentials, I have been recognized as "tree preservationist" with a national award from the Arbor Day Foundation in 2011 and the meritorious service award from the Connecticut Urban Forest Council in 2013. I was the founding director of Elm Watch from 1999-2007 and have led arboretum programs at North Canaan Elementary School since 1990 and at Housatonic Valley Regional High School since 2000.)

Comments on the DEEP's Hazard Tree Mitigation Process Policy Development

Submitted by: Chris Donnelly¹

March 28, 2022

At the outset, let me say that I am a supporter of Connecticut's State Parks. I have not been to all of them, but those that I have been to have not failed to impress and engage me.

I am also a supporter of the DEEP Staff—the men and women—who take care of these parks. The results of their efforts and their dedication shows.

I have also been following this discussion, including having listened to the recent public hearing, and I appreciate the points made by those who are concerned about how work has been done recently in some of these state parks. I know a few of the people who expressed these concerns and I have a great deal of admiration for their work.

That is not to say that I always agree with what they have to say. Let me start there. In the public hearing, one of the speakers said something to the effect that trees and forests have lasted for millennia, without foresters, and that trees manage well on their own, without the need for humans to try and straighten things out. Yes, things can be looked at that way, but at the same time, the forests did not form themselves into state parks all on their own, for the benefit of the people of the state and for their safe use. That is a responsibility that we, the people of Connecticut, have taken on. I think it is key to remember that point throughout.

Ostensibly, this is a discussion about hazard trees in state parks and campgrounds. However, I would suggest that that is too narrow of a focus from which to start. For this discussion to go where it needs to, the focus of the discussion needs to be broader. What are state parks and recreation areas, how did they come into being and why are they being managed as they are? Isolating the discussion to only one piece of the puzzle removes too much context. Informed decisions need the whole picture.

Along those lines, there are two concepts that seem to me to be woven into the background of the discussion, that I would like to see separated out and brought forward. The first is the idea that every tree that germinates within a state park or campground, or on any other DEEP-managed land for that matter, should be allowed to grow until it dies due to natural causes. Essentially, in this view, our parks and recreational sites are to be mini-wilderness areas, with disturbances to nature kept to a minimum. The second is that we should be preserving a snapshot image of our parks and campgrounds, keeping every tree, picnic area and campsite pretty much the same they exist currently, with as little change over time as is possible.

Neither idea stands up well to scrutiny, but they are highly appealing, nonetheless. They touch a chord. One reason people go to our state parks is because they want to have a direct experience with nature. It is also understandable for them to wish for this park to exist as it is, forever. What is missing in this view, however, is the amount of work that it took, and continues to take, for these state parks and the recreation areas to be as they are.

A look back at the past history of these properties is probably in order. None of these properties were always state parks. Previously, all or almost all saw intensive use for other purposes. Once, many of them were agricultural fields, held forests that were cleared, often recklessly, of their timber, were retreats for the wealthy or otherwise were accessible only to the privileged few. Their recovery from these past uses is part of their legacy and is one of the features that makes these areas so interesting.

¹ Qualifications include: CT Licensed Arborist, ISA Certified Arborist, TRAQ Qualified Arborist, ASCA Registered Consulting Arborist, CT Certified Forester, Retired DEEP Urban Forestry Coordinator

Of course, it should also be noted that very few of these properties have remained in the condition they were in when they were acquired by the state. Almost all have undergone some type of planning to guide their becoming what they are today and, in the process, have been remediated or altered in some way. They have not been state parks or recreation areas forever.

And then, there is the whole topic of what nature itself throws at these properties. Relatively recently, a single storm heavily impacted Kettletown State Park in Southington, including its prized campgrounds, Sleeping Giant State Park in Hamden and Wharton Brook State Park on the North Haven / Wallingford town line. In each of these parks, in less than hour, this storm caused massive destruction of trees and extensive damage to structures within these parks. Besides the initial clean-up and the follow-up efforts to make these parks safe for visitors, each of these parks will need to undergo years of restoration, as unsafe trees impacted by the storm continue to need to be removed and as trees regrow, according to a plan established by the park's managers. Planning, preparation and timing are all aspects of the slow, overall recovery that is occurring within these parks.

It is this planning process, along with the development of each park's character that takes time to occur, that I want to see given more attention in this discussion. These parks did not just happen. Often, they were intended, even if sometimes that intention came about because of a happy accident, such as with Dinosaur State Park. Even there, that park did not come to be what it is without some very dedicated individuals making some very thoughtful decisions about what that park should become.

At this point, I think it is fair to ask the question – are the state parks and other recreational areas throughout the state – which as a group are much admired for what they preserve and protect as well as for the opportunities they afford to state residents and visitors – in the condition they are in because of the efforts put into these state properties over the years by those responsible for their care and management? Or, are they are what they are in spite of these efforts?

Perhaps that question sounds like a cheap shot, but it needs to be asked in the wake of the heated rhetoric and strong statements that have been made in connection with the situation in Housatonic Meadows that sparked the current controversy. I should state that I have not visited the site in Housatonic Meadows personally and so have no personal view regarding the tree removals that were done within that park. I understand what people are saying – that the work that was done was ill-informed and done without guidance or direction and that the agency's hazard tree policy is poorly conceived and can become a tool for any local park manager to do whatever he or she wants to, under the cover of this policy. In this view, expediency and bad judgments are being allowed to rule the day in the place of concerns about conservation, maintenance of the park's legacy or careful assessment of the best way to do what needs to be done. At the same time, there are others who say that the hazard tree policy is a good faith effort to deal with a developing emergency situation and that it was properly applied in this case, and that the problem in this situation is that there was insufficient outreach to the public to explain this policy.

I am not going to venture into a discussion of which view is most likely to be true. However, I would like to offer a few suggestions to DEEP:

1. DEEP should be able to identify what the intentions and goals are for each of its parks and recreation areas. It should also be able to provide some assessment as to how well each property is doing with regards to these goals. This should include its plans for each park and recreational area with regards to the removal or mitigation of trees that are deemed to be hazardous. However, these assessments should not be limited to just potentially hazardous trees.

2. DEEP should also be able to provide clear statements regarding the success of its efforts on a statewide basis, including how well its now nearly 4 year-old program of hazard tree mitigation and removal has gone. Does DEEP consider it a success? If so, can it explain why it considers it successful up to this point? What are the outcomes that the agency feels the program has produced, in terms of ongoing public safety?
3. The agency should be able to produce similar assessments regarding other aspects of its management of its parks and recreation areas. How are its conservation measures, access to recreational opportunities and efforts to combat climate change proceeding in each of these properties?
4. Clear policies backed by the appropriate training are also highly important. With respect to determining whether or not a given tree is hazardous and what steps are appropriate should that determination be made, there are a wealth of opportunities available to the agency, including those within the state's borders. Specifically, I am referring to people with the necessary expertise to provide the needed training and to assist with writing the relevant policy. National models also exist, through the US Forest Service and the National Park Service, along with initiatives that other states have undertaken, from which much can be learned.
5. I believe that DEEP has within its own agency the people who already possess the basic skills, dedication and understanding of the resource that are prerequisite to assisting with the development and implementation of the needed policies. However, I would suggest that they need greater support at many levels if this is to work. This support should include training and clear direction, so that these staff members are able to work within their comfort zones, as well as reliable backing from management, sufficient resources including personnel and supplies, and access to outside expertise when required.

Before I conclude this overview regarding DEEP park policy, I would also like to discuss the legislative proposal of a blanket requirement that DEEP hire a CT Licensed Arborist to review each tree, or all trees after a certain minimum number, recommended for removal or pruning in a State Park or campground before that tree or those trees can be authorized for removal or pruning.

I am not in favor of this proposal. First, unless the question has to do with the need to remove or otherwise mitigate a tree because of its condition, I am not sure why the input of an arborist is being sought. If a tree or group of trees needs to be removed because, for instance, a hiking trail needs to be re-routed, I am not sure why the input of an arborist would be helpful, unless it is to advise on the condition of the trees along the re-routed trail. Likewise, if a tree such as an ailanthus or an Amur corkwood needs to be removed because, as invasive species, they threaten the health of the forest, I am not sure what an arborist would have to add, except perhaps to provide guidance on safe removal techniques.

Even in situations in which potentially hazardous trees are the concern, I think that it is likely that such a requirement would be unwieldy, unnecessarily expensive and potentially harmful, especially if it causes delays in the removal of tree identified by park personnel as hazardous. In that case, the personnel really have only one choice – to shut that area of the park down until the review is completed. To allow continued access to that area otherwise would be considered reckless.

In addition, in this proposal, there is no discussion as to what would happen if arborists were to happen to disagree with one another, as is also likely to be the case. What happens if DEEP hires an arborist who clears the removal of a tree and then a member of the public hires a different arborist who disputes the opinion of the first arborist?

I know that there are those who argue that a TRAQ-qualified arborist be used – that is, a certified or licensed arborist who has completed the Tree Risk Assessment Qualification course offered by the International Society of Arboriculture. It is my view that, if this were to become a standard way of proceeding, this recommendation would only slow the ability of managers to get anything done.

First, what is TRAQ? It is a designation offered by the International Society of Arboriculture. It tends to most of interest to those arborists who wish to develop a specialty in risk tree assessment. To earn this designation, an arborist must pass a 2-day course in the use of the standardized protocols developed to assess and then communicate the degree of risk associated with individual trees. Passing the training course is not, in and of itself, necessarily an indicator of advanced knowledge or experience with respect to making determinations of risk. Also, many, if not most, arborists experienced in assessing trees already possess the basic tree risk assessment skills behind the TRAQ designation, even if they have not taken the qualifications course. The course more about giving individual arborists the ability to understand and use the language of tree risk assessment than it is an in-depth course of study into the causes of tree risk and the methods of tree risk analysis.

For routine use, especially involving a large number of trees, the TRAQ methodology might be considered both slow and cumbersome. As stated in a relatively recent article² out of the University of Florida extension program “The level of detail required to complete this form (the ISA Tree Hazard Evaluation Form) significantly increases the time required to complete an assessment” and “The ISA Tree Hazard Evaluation Form is best suited for a commercial arborist or urban forester working with individual trees or smaller tree populations”.

There are many situations in which employing an arborist and, in particular, a TRAQ-qualified arborist would make eminent sense. There will be situations in which an individual tree or group of trees warrant special consideration. In those situations, hiring someone to give an outside opinion would be helpful. The trees at Housatonic Meadows may have been one such situation. However, it does not make sense for the use of such services to become routine and be made obligatory, when most of the decisions to be made are likely to be straight-forward and/or non-controversial.

To sum up - I am in favor of increased training and clearer policies regarding the removal or mitigation of potentially hazardous trees on state parks and campgrounds. There is a wealth of resources available to the agency that could be used to facilitate understanding of the aims of the agency, both internally and to the public. Encumbering the agency with unnecessary and expensive additional requirements is not likely to be particularly helpful. In my opinion, it would be much more effective to spend that money internally, both to be sure that staff are given a clear understanding of what they should be doing and so that management can do the research needed to make the right determinations and then has the necessary resources to properly communicate those determinations to the public.

² “Tree Risk Assessment Methods: A Comparison of Three Common Evaluation Forms” by Andrew K. Koeser, Gitta Hasing, Drew McLean, and Rob Northrop, UF/IFAS Extension Publication ENH1226. Original publication date October 2013. Available at <http://edis.ifas.ufl.edu/>. Both citations are from page 5 of the publication.