



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

April x, 2025

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Re: Pachaug State Forest - Wyassup Block- Forest Management Plan

Dear Michelle Auclair,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Management Plan (FMP) for the Pachaug State Forest - Wyassup Block (PSF-WB).

The Wyassup block, which is located in North Stonington, totals 2,722 acres or approximately 10 percent of the Pachaug State Forest. The draft FMP identifies various land management activities that would be implemented over the next 10 years on over 450-acres. These land management activities would consist primarily of silviculture¹, but other tools, such as herbicide treatments for invasive species and forestry mowing would also be employed in certain stands.

Old-Forest Management²

The draft FMP notes that 119 acres or 4.4 percent of the land area within the PSF-WB have been placed in the “Old Forest Management Area” category, which means “designated areas to be maintained as long-term forest reserves where no active, or commercial forest management occurs”. The Council notes that the 119 acres designated as “Old Forest” is significantly less than DEEP’s goal to “establish or promote areas of advanced successional stages of forest growth comprising approximately ten (10) percent of the State Forest System, in aggregate”³. The Council suggests that the draft FMP include a discussion that explains the rationale for only designating 4.4 percent of the land area as “Old Forest” within the PSF-WB.

Wetlands and Vernal Pools

The draft FMP states that “several streams, tributaries and wetlands, along with 2 lakes are located throughout the management area” and that certain areas with the PSF-WB are designated as “inaccessible” or “inoperable” due, in part, to the presence of water resources and wetlands. However, it is unclear if wetlands and vernal pools have been identified in the stands designated for silvicultural operations, habitat enhancement work, and non-commercial forest product work (M. Work Plan). And while the draft FMP notes that “leaving a standard ‘undisturbed’ riparian corridor buffer zone, or leave strip, 100 feet wide along each side of a perennial stream and 50 feet wide along each side of an intermittent stream” is a Best Management Practice recommended,

¹ silviculture – The art, science, and practice of establishing, tending, and reproducing forest stands with desired characteristics.
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but not required for all timber harvests, it is unclear what protections and best management practices would be employed/allowed proximate to wetlands and vernal pools, if present. The Council recommends that the draft FMP specify how wetland areas and any vernal pools would be identified and protected in the stands designated for active forest management.

Core Forests

The draft FMP states that “core forest is defined as a forest that is at least 500-contiguous-acres in size and at least 300-feet from other land uses including residences, farm land, and paved roads”. The Council recommends that the draft FMP identify if the proposed forestry management activities may significantly affect core forest. In addition, the Council suggests that the definition of “core forest” in the draft FMP be revised to more closely match the statutory definition identified in Connecticut General Statutes [Section 16a-3k](#) since the statutory definition does not require the forest to be “at least 500-contiguous-acres in size”.

Hazard Trees

The draft FMP states that “DEEP has been actively removing hazard trees (damaged, dead or diseased (*sic*) trees) in affected blocks since 2017. Hazard tree removal has taken priority when the affected trees are within striking distance of infrastructure (campgrounds, buildings, etc.), trails, parking areas, picnic areas, and roads”. The Council notes that DEEP’s Statewide Tree Hazard website⁴ identifies a portion of the Pachaug State Forest in Voluntown for tree removal work associated with “Wildfire Risk Reduction”. Specifically, the website states that two “areas were ranked as priority 3 & 4 sites for Wildfire Risk Reduction work based on widespread oak mortality, presence of flashy fuels known to present fire control problems, and a historical record of large wildfires in the vicinity”. The Council suggests that DEEP identify in the draft FMP if stands within the PSF-WB are experiencing similar conditions and if tree removal or similar actions are proposed to address the potential threat of wildfires.

Wildlife

The draft FMP notes that a National Diversity Database (NDDDB) determination, dated February 26, 2024, identified “one freshwater fish species of Special Concern, two reptile species of Special Concern, two mammal species of Special Concern, two bird species (one of Special Concern and one Threatened) and five plants (four of Special Concern and one Endangered)”. The Council notes that the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (IPaC) indicates that northern long-eared bat (NLEB), a species that has recently been reclassified as “endangered” under the Endangered Species Act, and tri-colored bat (TCB), a species proposed for official listing as endangered, might occur in the vicinity of the PSF-WB. Although the draft FMP states that “Best Management Practices and other recommendations outlined by the NDDDB Program will be applied to timber harvesting operations to minimize adverse impacts to listed species”, the Council recommends that the draft FMP include a description of any recommended protective measures, such as time of year restrictions on tree removal, that could be employed to minimize any potential impacts on NLEB and TCB.

Cultural sites

The draft FMP notes that “the land in and around Pachaug State Forest has been well-documented as seasonal grounds for Narragansett, Pequot, and Mohegan Indians. There are several artifacts throughout Pachaug State Forest reminiscent of the tribes including a V-shaped stone wall with an opening to funnel deer and other game species to a killing site, as well as a rock shelter and petroglyphs.” Although the draft FMP states that “the Division of Forestry will include the State Archeologist and State Historic Preservation Office (SHPO) in reviews of any forest operation plans which may affect known cultural resources”, the Council suggests that DEEP also consult the recognized indigenous tribes, and others to assist with the determination regarding whether any of the proposed forest management activities may affect known cultural resources, especially in the stands designated for active forest management.

² There are 115 acres (comp. 4 stand 10) designated in this block (*sic*) as an OFMS. Section 7, page 12

³ Connecticut Department of Energy and Environmental Protection (DEEP), The Preserve State Forest Draft Management Plan.

⁴ <https://portal.ct.gov/deep/forestry/forest-protection/statewide-tree-damage>

Invasive Species

The draft FMP states that “several stand treatments are “dependent” on controlling the non-native invasive vegetation in the understory before any management occurs. Herbicide/mowing of the understory will occur as funding is available”. The Council suggests that the draft FMP clarify if the proposed forest management activities would still proceed as scheduled if funding were not available to control non-native invasive vegetation in the understory.

The Council notes that Map C, Site Quality Map depicts areas identified by the Legend “Site Index” as high, medium, and low. However, it is unclear if the site quality refers to the health and quality of the growing stock or what criteria has been established for such designations. The Council recommends that the draft FMP include a description and/or criteria that describes the areas depicted as high, medium, and low on the “Site Quality” map.

The Council notes that Map F – Work Plan Map indicates that stand 7-12 and 7-13 are proposed for “clear cut”. While stand 7-12 is designated for “Forestry Mowing” in the table on page 29, Silvicultural Operations Schedule, stand 7-13 is not. The Council recommends that 1) a definition for “clear cut” be added to the Definitions in Appendix C, and 2) stand 7-13 be identified in one or more tables in the “Work Plans” section of the draft FMP. The Council also recommends that the total acreage of forest management activities be updated to reflect the addition of stand 7-13, if appropriate.

The Council questions why the comments identified in “Appendix A – Review and Comments – DEEP Staff” on pages 38 and 39 are redacted. The Council suggests that the draft FMP explain the rationale for redacting comments from DEEP staff, remove the redaction, or remove Appendix A if not applicable.

Thank you for your consideration of the Council’s comments.

Sincerely,

Paul Aresta
Executive Director

C. Christopher Martin, DEEP, Director – Division of Forestry/State Forester