



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

July 27, 2023

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Paul Aresta
Executive Director

Re: Forest Management Plan - 2023 through 2038 Pachaug State Forest
(Mount Misery, Stone Hill, & Plainfield Blocks)

Daniel.Evans@ct.gov

The Council on Environmental Quality (Council) provides the following comments and questions in response to the Department of Energy and Environmental Protection's (DEEP) notice to adopt, with final approvals, a Forest Resource Management Plan for the Mount Misery, Stone Hill, and Plainfield Blocks within the Pachaug State Forest.

- The Council's position has been that certain forestry operations could be an action that requires public scoping to determine whether an Environmental Impact Evaluation is needed, consistent with the Generic Environmental Classification Document. If scoping is not done for the implementation of the proposed forest management activities, would there be public notice of the proposed management activities in future years?
- The Plan notes that 2,194 acres are considered to be wetlands, which are important for greenhouse gas sequestration, and of that, over 1,800 acres are considered inoperable. Are some of the 390 acres of wetlands considered as active or potentially active forestland? (see comment on the Atlantic White Cedar stand)
- The Plan notes that on wildlife acres and on recreation acres, the Wildlife Division or the State Parks Division are responsible for management activities. Will there be forest harvesting activities that occur on either wildlife or recreation lands that would result in forest products?
- The Plan states that there is a management goal to establish new "old forestland" management sites for a total of ten percent (10%) of the active forest land acreage. Is this new "old forestland" drawn from existing active forestland, thus reducing the 7,157 acres that have the potential to be actively managed? Are the 742 acres proposed for new "old forestland" within productive areas or within "sub-marginal" land for forest production and wildlife habitat?
- The Plan notes the presence of "critical habitat" (558 acres) and "natural area preserves" (628 acres). Are the natural area preserve acres "active", "inactive" or in some other acreage category? Would the Atlantic White Cedar stand be harvested to promote regeneration during the winters when the ground is frozen?
- The Plan states that "individual management plans for specific Natural Area Preserves are held by the Office of the Assistant Commissioner." Is there an opportunity for the public to inspect and provide input for these "individual management plans"?
- The Council notes that it would be helpful to include a glossary of terms within the Plan.

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

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive style with a long horizontal flourish at the end.

Paul Aresta,
Executive Director

c. Christopher Martin, CT DEEP