



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

October 23, 2024

[Nathan.Piche@ct.gov](mailto:Nathan.Piche@ct.gov)

Re: Salmon River State Forest: Gilead Block

Dear Nathan Piche,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) for the Salmon River State Forest: Gilead Block (SRSFGB).

#### 1. Old-Forest Management Site

The draft FMP notes that there are total of 1,767 acres that comprise the SRSFGB and that approximately 430 acres have been placed in the “Old Forest Management Site” category. The Council notes that the area designated as “Old Forest Management Site” totals approximately 24 percent of the total area of the SRSFGB without counting the areas that are designated as “Inaccessible” (31 acres), “Inoperable” (74 acres), and “Wetlands” (138 acres). Since the overall goal of forest management plans in Connecticut is to “establish or promote areas of advanced successional stages of forest growth comprising approximately ten (10) percent of the State Forest System, in aggregate”,<sup>1</sup> the Council supports the Connecticut Department of Energy and Environmental Protection’s (DEEP) proposal to designate almost a quarter of the total area of the SRSFGB as areas selected to grow and evolve naturally without active management.

#### 2. Habitat and Wildlife

A recent draft FMP for The Preserve State Forest (TPSF), located in Westbrook/Old Saybrook, identified core protected areas (CPA) that were so designated based, in part, on the identification of vernal pools, an assessment of the vernal pools’ productivity, and turtle telemetry data. The draft FMP for the TPSF noted that “during silviculture activities conducted on the property, any mechanized work will be kept out of the CPA”.<sup>1</sup> The Council supports the identification of environmentally sensitive resources and the potential restriction on the use of “ground impacting equipment” within those environmentally sensitive resource areas in other FMPs, as appropriate. The Council recommends that DEEP include the identification of sensitive environmental resources in areas initially designated for silviculture/active forest management activities for all new or revised FMPs, and use that information to potentially refine forest management decisions.

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

<sup>1</sup> Connecticut Department of Energy and Environmental Protection (DEEP), The Preserve State Forest Management Plan.  
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