



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

August 28, 2024

Alexander.Amendola@ct.gov

Re: Forest Resource Management Plan –The Preserve State Forest

Dear Alexander Amendola,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) for The Preserve State Forest (TPSF)

1. Old-Forest

The FMP notes that there are total of 924 acres that comprise TPSF and that approximately 30 acres have been placed in the “Old Forest” category, which are areas selected to grow and evolve naturally without active management. Further, there is a statement in the FMP that “old forestland management sites are analogous to forest reserves which are intended to grow undisturbed for long periods of time and store large amounts of accumulated forest carbon.” 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”, the Council recommends that DEEP re-assess the forest management options for the TPSF and potentially designate additional acreage as “Old Forest”, possibly within the core protected areas (CPA), to approach the ten percent goal for TPSF.

2. Habitat and Wildlife

The FMP identifies CPA that have been so designated based, in part, on the identification of vernal pools, an assessment of the vernal pools’ productivity, and turtle telemetry data. This includes weighted wetland buffers based on an individual pool’s productivity and/or usage by turtles. In addition, there is a statement in the FMP that “during silviculture activities conducted on the property, any mechanized work will be kept out of the CPA (Klemens 2023). This does not include hand felling, weeding, or use of hand-held devices such as chainsaws, brush saws, etc. Timber Stand Improvement is an approved activity (done without ground impacting machinery) within the CPA.” The Council supports the identification of critical environmental resources, the designation of CPAs, and the restriction on the use of “ground impacting equipment” within the CPAs. The Council questions how trees felled by hand-held devices within a CPA would be removed without the use of mechanized equipment, such as a skidder.

The Council also questions if silviculture activities conducted by hand-held devices within the CPAs would be allowed within the vernal pool envelope (VPE) of any Tier I vernal pools. The Council suggests that DEEP assess the potential adverse impacts to Tier I vernal pools resulting from the removal of vegetation/canopy within the VPE, and revise the proposed silviculture activities in those areas, as appropriate.

3. Emergency Plan

The FMP includes a statement that “the physical location of the property near the coast, can increase the likelihood for hurricanes and other storms to make landfall, creating larger-scale

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disturbances”. The Council questions if the draft FMP should include provisions to address public safety and forest health following a storm that significantly impacts TPSF, which, at a minimum, should address who would be in charge and what initial steps would be undertaken to address the aftermath of such an event.

4. Forest Health and Invasive Species

The Council supports the measures identified in the FMP to address invasive species and forest health. For most of the stands within TPSF, there is an assessment of the overall health of the stand, the type and extent of invasive species within the stand, and some discussion of management activities to address specific threats. The FMP also includes statements regarding the lack of regeneration of various tree species within the stands, including but not limited to ash, which has been significantly impacted by the emerald ash borer (EAB). The Council suggests that there be a provision within the “General Property Recommendations” to assess and implement measures to foster the re-establishment or regeneration of tree species significantly impacted by disease and/or pests, such as ash, within the TPSF.

5. Definitions

The Council suggests that various terms used in the FMP, including but not limited to core protected area, stand initiation, stem exclusion, understory reinitiation, and old growth be defined in the glossary.

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

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Aresta
Executive Director