



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

Keith Ainsworth
Acting Chair

September 24, 2025

Timothy J. Bishop

Robert Turnbull
RTurnbull@aquarionwater.com

Linda Bowers

Re: Updated Forest Resource Management Plan Centennial Watershed State Forest: Easton Reservoir Block

Christopher Donnelly

Dear Robert Turnbull,

David Kalafa

The Council on Environmental Quality (Council) provides the following comments regarding the draft Updated Forest Resource Management Plan (FMP) for the Centennial Watershed State Forest: Easton Reservoir Block (ERB).

Cinzia Lettieri

Aimee Petras

The draft FMP notes that all activities within the ERB are overseen jointly by representatives from Aquarion Water Company (AWC), Connecticut Department of Energy and Environmental Protection (DEEP), and The Nature Conservancy (TNC), who comprise a managing body called the Conservation Land Committee (CLC). The draft FMP also notes that the ERB is located in the towns of Easton, Monroe and Trumbull and occupies approximately 3,125 acres, which consists primarily of mature hardwood forest north of and adjacent to the Easton Reservoir.

Denise Rodosevich

William Warzecha

The draft FMP identifies specific actions to improve forest structure and maintain overstory species diversity including, but not limited to, active management of 1,095 acres over the period of this plan (20 years) consisting of: 111 acres that would be selectively harvested, 452 acres that would be thinned, 400 acres that would be regenerated using the shelterwood with reserves system, 132 acres that would undergo timber stand improvement (TSI), and the control of invasive species where appropriate.

Paul Aresta
Executive Director

The draft FMP states that “2,029 acres of the forest will be managed passively (62% of the total forested acres, 64% of forested acres), including 91 acres of swamps and fields, 265 acres of Old Forest Management sites, 136 inaccessible acres, 273 inoperable acres, and **1,263 actively managed acres** that will be left to grow.” This inclusion of land categorized as being both actively managed and passively managed can be confusing to a reader, even if it is made clear elsewhere that this is only being done in the context of the timeframe of this plan. Perhaps setting these 1,263 acres into a separate category by describing it as ‘land held to be actively managed at a later time but left free to grow within the time frame of this plan’ would provide greater clarity to the reader.

The definitions provided in the draft FMP might also introduce some confusion. As defined in the draft FMP, active management “involves using equipment to manipulate the condition of the forest canopy. This could include timber harvesting on a large scale or simply felling some trees for firewood with a single chainsaw” whereas passive management “refers to NOT conducting any forest management activities (no timber harvests). Passive management approaches still allow for the removal of identified adversely affecting agents such as invasive species and management of the deer population.” Given the current definitions for active and

passive management, the Council questions if it is appropriate to include the 1,263 acres of “actively managed acres” in the total acres (2,029 acres) that are designated to be “managed passively”.

The draft FMP also states that “in addition to the 766 acres of this Block that are not accessible to management, inoperable, swamp, fields or old forest management sites, a total of 2,029 acres of the Easton Reservoir Block will be managed passively through the term of this plan”; however, the 766 acres are included in the 2,029 acres and are not “in addition” to the total. The Council suggests that the draft FMP clarify the acres that are designated to be managed passively to avoid confusion.

Invasive species

The draft FMP states that “numerous invasive species” are identified as a forest health stressor affecting the ERB and that “action will be taken to lessen the impact of invasive species on the property”. Further, it is noted that the recommended management goal for invasive species is to minimize the population where possible and reduce their potential effect on forest health and regeneration, and that “invasive species will be located, identified, and controlled.” However, it is unclear how the invasive species would be controlled. The Council suggests that the draft FMP include information on how the various known threats to forest health would be addressed. If pesticides and/or herbicides are proposed to be employed to control invasive species and/or other pests, the Council recommends that such use be minimized to the extent practicable within the public drinking water supply watershed and that applications within 100 feet of watercourses, wetland and vernal pool resources should be avoided.

Watercourses, Wetlands and Vernal Pools

The draft FMP notes that there are 88 acres of open wetlands (swamps) and approximately 166 acres of forested wetlands within the ERP. It also notes that several streams and rivers are located within the ERB, including the West Pequonnock River and the Mill River, which features an important trout conservation area just south of the Easton Dam. The draft FMP states that “the most effective way to preserve aquatic habitats in a timber harvest is through the strict adherence of forestry BMPs for water quality”, which “can include the establishment of 100-foot no-cut buffers around perennial streams, establishing water bars on skid trails and truck roads on a slope, reseeding areas of exposed soil that are near watercourses, and filling in ruts that may have resulted from heavy equipment.” Since the first “Management Goal” identified in the draft FMP is “to promote and protect high-quality drinking water”, the Council recommends that the draft FMP identify and affirm the BMPs that would be employed/allowed proximate to environmental resources, such as watercourses, wetlands, and vernal pools. Further, the Council suggests that the draft FMP also incorporate best development practices¹ for “site clearing, grading, and construction activities” proximate to a vernal pool(s) to better protect vernal pool obligate species that might be present.

Wildlife

The Council notes that the United States Fish and Wildlife Service (USFWS), Information for Planning and Conservation (IPAC) tool indicates that there is the possibility that tri-colored bat (TCB), a species proposed for official listing as “endangered” under the Endangered Species Act, might occur in the vicinity of the ERB. Since the draft FMP identifies various management activities that could impact TCB (a tree nesting bat species), the Council recommends consultation with DEEP’s Wildlife Division regarding protective measures, such as time of year restrictions on tree removal, to minimize any potential impacts on TCB and incorporate those protective measures into the draft FMP.

The draft FMP also notes that DEEP’s Natural Diversity Database (NDDDB) provided a report, dated February 1, 2024, that identified five (5) protected wildlife species with the potential to exist in the ERB, including one bird species, two turtle species, one snake species, and one plant species. Although the draft FMP notes that “each species comes with specific recommendations for the maintenance and establishment of their habitat, as well as best practices for their protection”, the recommendations and “best practices” are

¹ Calhoun, A. J. K. and M. W. Klemens. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society; <https://www.nae.usace.army.mil/Portals/74/docs/regulatory/VernalPools/BestDevelopmentPractices20Oct2014.pdf>

not included in the draft FMP nor is there any discussion of how or if the proposed forest management activities could impact the state-listed species. Consequently, the Council suggests that the draft FMP identify the recommended protection measures and clarify if or how the proposed forest management activities might impact the species identified by NDDDB.

The draft FMP states that “an overabundance of deer has resulted in the ingrowth of black birch, red maple, and American beech” and that one of the primary health stressors in this forest is “the high abundance of deer” that prevents the forest from regenerating itself to a diverse suite of native vegetation. The draft FMP includes numerous statements about the lack of diversity and undergrowth on the forest floor caused by high deer browse intensity; however, there is little or no information on what measures would be employed to address this issue. In another recently released draft FMP, DEEP identified at least two strategies to address deer browse: 1) a slash wall made from down woody material placed around the perimeter of a project area that could make it difficult for deer to traverse, and/or 2) fencing in sprouts of desirable regeneration to protect them from browsing when they are most vulnerable (<6 feet tall and at deer eye level). Given the great importance of deer browse management to the success of this FMP and its stated goals, a more thorough discussion of which deer management options might be employed or the process that might be used to select an approach to deer browse management is recommended.

The Council notes that the Site Index Maps identify areas by the Legend “Site Index” as high, medium, and low. However, it is unclear if the site index ratings refer to the health, quality, or density of the growing stock or what criteria has been established for such designations. The Council suggests that the draft FMP include a description, definition and/or criteria that describes the areas depicted as high, medium, and low for the Site Index Maps.

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, flowing style.

Paul Aresta
Executive Director

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