



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

January 22, 2025

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Gerard Milne
Bureau of Natural Resources – Division of Forestry
Connecticut Department of Energy & Environmental Protection (DEEP)
Gerard.Milne@ct.gov

Re: Centennial Watershed State Forest - Lakeville Reservoir Block

Dear Gerard Milne,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) for the Centennial Watershed State Forest - Lakeville Reservoir Block (LRB).

The draft FMP notes that the primary purpose of the properties that make up the LRB is to protect and improve the quality of the drinking water supply for the village of Lakeville. The draft FMP identifies specific actions to improve forest health and resiliency including, but not limited to:

- treating “invasive exotic plants” to allow regeneration of native species, primarily in the understory of Stands 4, 5, 6, 7, 8, 9, 10, and 16; and
- conducting selected harvests on 76 acres, a thinning on 15 acres, and non-commercial Timber Stand Improvement (TSI) on approximately two acres.

Old-Forestland Management

The draft FMP notes that there are total of 400 acres that comprise the LRB and that approximately 179 acres have been placed in the “Old Forestland Management” category, which means that area will be set aside to allow natural processes “to occur without the influences of active forest management (except for forest fire suppression)”. The Council notes that the area designated as “Old Forestland Management” accounts for approximately 45 percent of the total area of the LRB without counting the areas that are designated as “Inaccessible” (120 acres), and “Inoperable” (7 acres). The Council supports the designation of land within the LRB as “Old Forestland Management”.

Wetlands

The draft FMP identifies McDuffee and Burton Brooks as surface water features within the LRB; however, the Council notes that other areas of wetlands within the LRB are not identified in the draft FMP. The Council recommends that the draft FMP identify wetland areas in the stands that are designated to receive selected harvests, thinning, non-commercial TSI, or other management practices. And while the draft FMP notes that there would be a “100-foot no cut buffer” adjacent to both streams noted above, it is unclear what protections and active management practices, such as removal of “exotic invasive plants”, would be employed/allowed proximate to wetland resources. The Council recommends that the draft FMP identify how wetland areas would be protected.

Cultural sites

The draft FMP states “it is not known if there are sites from indigenous peoples in the Block. The Weatogue community, part of the Mohican people, had a settlement in the northeastern part of Salisbury, near the Housatonic River, before European colonization.” The Council recommends that DEEP consult with the State Historic Preservation Office (SHPO), the recognized indigenous tribes¹, and others to determine if there are culturally significant sites in the LRB, especially the stands designated for active management.

Core Forests

The Council notes that the draft FMP does not identify or reference core forest within the LRB. According to the 2015 Forest Fragmentation data² and the Forestland Habitat Impact Map³, portions of LRB are designated as core forest. Further, the draft FMP states that “the Block is bordered to the north by Mount Riga Incorporated, a privately owned woodland of about 4,000 acres” and “the Block is bordered on the east by SALT’s 241-acre Yoakum Preserve”⁴. The Council recommends that the draft FMP identify 1) the extent of core forest within the LRB, and 2) if the proposed forestry management activities may significantly affect core forest.

Wildlife

The draft FMP notes that Northern long-eared bat (NLEB), a State and Federally Endangered Species, might be located within the LRB and that may “require consultation with the US Fish and Wildlife Service” if the proposed project requires federal permits or uses federal funds. The Council notes that DEEP’s Northern Long-eared Bat Map, dated July 24, 2023, identifies Salisbury as an area with known “Winter Occurrence” of NLEB. 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 other tree-nesting bat species. The Council notes that Section H, Wildlife Management, identifies certain state-listed species that might be present within the LRB. The Council recommends that the draft FMP clarify if or how the proposed forest management activities might bolster or impact the species identified by NDDB, and if specific mitigation measures are warranted to address the proposed land management activities described in the draft FMP

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

¹ Connecticut General Statutes Section 47-59a (b)

² <https://www.arcgis.com/home/item.html?id=f137bb4d81874f5eaccdbf110df098c>

³ <https://ctdeep.maps.arcgis.com/apps/webappviewer/index.html?id=7b81844bab634281b544c20bf2d7bfb8>

⁴ Salisbury Association Land Trust (SALT)