



## STATE OF CONNECTICUT

# COUNCIL ON ENVIRONMENTAL QUALITY

### VIA ELECTRONIC MAIL

January 22, 2025

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Paul Aresta  
Executive Director

Dan Evans  
Forester II – State Lands Management  
Bureau of Natural Resources – Division of Forestry  
Connecticut Department of Energy & Environmental Protection (DEEP)  
79 Elm Street, Hartford, CT 06106-5127  
[Daniel.Evans@ct.gov](mailto:Daniel.Evans@ct.gov)

Re: James L. Goodwin State Forest - Forest Management Plan

Dear Dan Evans,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Management Plan (FMP) for the James L. Goodwin State Forest (GSF).

The scope of the draft FMP would include approximately 1,853 contiguous acres in the towns of Hampton and Chaplin and a 354-acre portion of Natchaug State Forest (NSF) for a total of 2,207 acres. The draft FMP identifies various land management activities that would be implemented over the next 10 years on over 900-acres. These land management activities would consist primarily of silviculture<sup>1</sup>, but other tools, such as herbicide treatments, forestry mowing and mulching projects, and prescribed burns would also be employed.

### **Old-Forestland Management**

The draft FMP notes that two percent or approximately 45 acres have been placed in the “Old Forest” management category, which means that area will be set aside “as passively managed forest reserves to allow for the natural processes of forest development to occur without the influence of active forest management”. However, the draft FMP states that “portions of the stand may be subject to small-scale forest stand improvement cutting to facilitate the complex structural conditions documented in old forests. The Council questions if the proposed “small-scale forest stand improvement cutting” would be considered “passive management”. The Council notes that the 45 acres designated as “Old Forest” is significantly less than DEEP’s goal 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>2</sup>. The Council suggests that the draft FMP include a discussion that explains the rationale for only designating 45 acres (Compartment 19, stand 1) as “Old Forest” within the GSF/NSF.

### **Wetlands and Vernal Pools**

The draft FMP identifies Pine Acres Lake, Black Spruce Marsh and Brown Hill Marsh, and six perennial streams as surface water features and an estimated 164 acres of forested wetlands within the GSF/NSF. The Council notes that areas of wetlands and any vernal pools within the GSF/NSF are not depicted in the draft FMP. The Council recommends that the draft FMP identify and depict wetland areas and vernal pools in the stands that are designated to receive active management practices. And while the draft FMP notes that riparian corridors would be protected with an undisturbed 100-foot-wide riparian buffer zone on perennial streams and a 50-

foot wide no equipment buffer on intermittent drainages, it is unclear what protections and active management practices would be employed/allowed proximate to wetlands and vernal pools. The Council recommends that the draft FMP identify how wetland areas and any vernal pools would be protected.

### **Core Forests**

The draft FMP states that “the James L. Goodwin State Forest represents the southern extent of a semi-contiguous block of conserved large core forest which extends north into Massachusetts, and encompasses numerous State, University, and Land Trust parcels”. Further, the draft FMP states that the “James L Goodwin SF contains significant tracts of undeveloped forestland composed of multiple large core forest blocks (>500 acres; CLEAR 2015) within the increasingly fragmented landscape of southern New England”. The Council recommends that the draft FMP identify if the proposed forestry management activities may significantly affect core forest. In addition, the Council suggests that the definition of “core forest” in the draft FMP be revised to more closely match the statutory definition identified in Connecticut General Statutes [Section 16a-3k](#).

### **Wildlife**

The draft FMP notes that a National Diversity Database (NDDDB) determination, dated December 22, 2021<sup>3</sup>, identified “eight plants, one vertebrate, three invertebrates, and two natural communities occurring within the planning area”. The Council notes that the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (IPaC) indicates that northern long-eared bat (NLEB), a species that has recently been reclassified as “endangered” under the Endangered Species Act, and tri-colored bat (TCB), a species proposed for official listing as endangered, might occur in the vicinity of the GSF/NSF. 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 TCB. Further, the Council suggests that draft FMP clarify if or how the proposed forest management activities might bolster or impact the species identified by NDDDB and the USFWS, and if specific mitigation measures are warranted to address the proposed land management activities described in the draft FMP.

The Council notes that Map C, Site Quality depicts areas identified by the Legend “Site Index” as high, medium, and low. However, it is unclear if the site quality refers to the health and quality of the growing stock or what criteria has been established for such designations. The Council recommends that the draft FMP include a description and/or criteria that describes the areas depicted as high, medium, and low on the “Site Quality” map.

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

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<sup>1</sup> silviculture – The art, science, and practice of establishing, tending, and reproducing forest stands with desired characteristics.

<sup>2</sup> Connecticut Department of Energy and Environmental Protection (DEEP), The Preserve State Forest Draft Management Plan.

<sup>3</sup> Each planned silvicultural operation would undergo an additional site-specific NDDDB data request and Determination before commencing.