

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

June 24, 2026

Alexander J. Amendola
Forester 1, Forestry Division
Connecticut Department of Energy & Environmental Protection
18 Ranger Road, Haddam, CT 06438
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Re: Updated Forest Resource Management Plan — Cockaponset State Forest Westwoods-Killingworth-Winthrop Blocks

Dear Alexander Amendola,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) for the Cockaponset State Forest (CSF) - Westwoods-Killingworth-Winthrop (WKW) blocks and two Wildlife Management Areas (WMA).

The WKW blocks within the CSF total 4,211 acres within Guilford, Madison, Killingworth, Deep River, Clinton, and Westbrook, and the Menunketesuck and Messerschmidt Pond WMAs total an additional 629 acres within Clinton, Westbrook, and a small portion of Essex.

Summary

As discussed in more detail below, the Council suggests the following refinements to the draft FMP for the WKW blocks within the CSF and the WMAs.:

- explanation for re-designating 49 acres from Old Forestland Management Sites (OFLMS);
- identification of wetland areas and vernal pools and how such environmental resources would be protected;
- identification of measures to ensure a “healthy forest”;
- identification of any recommended protective measures that could be employed to minimize any potential impacts to state and federally-listed species; and
- identification of measures to address unauthorized/illegal activities.

Old-Forestland Management

The draft FMP notes that some stands will be removed from this designation due to the ecological needs of plant species present. While the Council supports healthy and diverse forests, the Council questions if a policy exists for the removal of state forest from OFLMS designation or if there are specific criteria used to justify such re-designation since active management would alter “their natural successional ecology.” If so, the Council suggests that the draft FMP include such information. The Council also questions if other blocks within the CSF would be re-designated from “active forest” to OFLMS to compensate for the proposed removal or redesignation of OFLMS (49 acres).

Watercourses, Wetlands and Vernal Pools

The draft FMP identifies Messerschmidt Pond and its tributaries, Falls River, Wrights Pond and a tributary, Horse Pond, Menunketesuck River and other streams as surface water features in the text. However, most surface water features (rivers and streams), and areas of wetlands and vernal pools within the compartments designated for active silvicultural treatments are not depicted in the draft FMP. The Council suggests that surface water features (rivers and streams), wetland areas and vernal pools be identified and depicted in the draft FMP for the stands that are designated to receive active forest management activities.

The draft FMP states that “the Fisheries Division recommends a minimum of a 50-foot riparian buffer around intermittent streams and a 100-foot buffer around perennial streams.” The draft FMP also states that “this buffer does not mean that management activities cannot take place within the buffer. Activities to manage/eliminate invasive species or increase forest resiliency for example are encouraged.” This statement suggests that the recommended riparian buffers could potentially be impacted for any forest management activity that could increase forest resiliency. The Council recommends that the draft FMP identifies how wetland areas and any vernal pools would be protected in the areas that would receive active forest management and invasive species control, and that certain forest management activities that are likely to adversely impact water quality and habitat be prohibited within riparian and/or wetland buffer areas.

Forest Health

The Council notes that the draft FMP includes a section on “forest health.” However, other than the control of invasive plants and promoting forest species diversity, it is unclear what actions, if any, would be undertaken to address diseases or insects within the CSF. And while the draft FMP notes that effects on tree regeneration during recommended operations will likely be impacted by deer browse, it is also unclear where, when and which deer mitigation techniques would be employed. The Council suggests that the draft FMP includes additional information on specific actions that would be undertaken to address problems with forest health and/or deer browse.

Wildlife

The draft FMP notes that sections of the WKW Blocks contain areas where state and federal endangered, threatened, or special concern species are known to occur. Further, the draft FMP states that a National Diversity Database (NDDB) determination was received that identified “three turtle species, three mammal species, one fish species, six bird species, nine plant species, and two insect species (one butterfly and one beetle species).” In addition, the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool indicates that Northern long-eared bat (NLEB), a species listed as endangered, and tri-colored bat (TCB), a species proposed for official listing as endangered might occur within the CSF. Consequently, the Council suggests that the draft FMP includes: 1) any recommended protective measures, such as time of year restrictions on tree removal, that could be employed to minimize any potential impacts to state and federally-listed species from the proposed forest management activities, and 2) how the proposed forest management activities might bolster or impact the species identified by NDDB and the USFWS.

Pesticides

The Council notes that the use of pesticides is proposed to primarily control invasive species. The Council supports the proposed coordination with DEEP’s Wildlife Division prior to using any pesticides. The Council suggests that the use of herbicides and insecticides within the CSF should be minimized and applications within 100 feet of watercourses, wetland and vernal pool resources should be avoided to the extent practicable. The Council suggests that the draft FMP includes additional information regarding where and how pesticides might be applied.

Unauthorized/Illegal Activities

The draft FMP states that “illegal and unauthorized activity are rampant in all areas of the Cockaponset,” such as unauthorized trails (typically mountain bike trails), illegal all-terrain vehicle (ATV) use, illegal cutting of

vegetation, and intentional abuse of forest road infrastructure by 4x4 drivers for an “off-road” experience. The draft FMP also states that “this will hopefully be addressed with the aid of law enforcement in the coming management cycle.” The Council agrees that unauthorized or illegal activities that adversely impact forest health, water quality, wildlife, etc., are a serious concern. As such, the Council encourages the Division of Forestry and DEEP to make dealing with this concern a matter of priority. The Council suggests that the draft FMP includes additional information on specific actions that could be undertaken to address unauthorized or illegal activities.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta", with a stylized flourish at the end.

Paul Aresta
Executive Director

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