

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

July 22, 2026

Gerard Milne
Connecticut Department of Energy and Environmental Protection
Division of Forestry
2065 Thomaston Road
Watertown, CT 06795
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Re: Updated Forest Resource Management Plan — Mohawk State Forest

Dear Gerard Milne,

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

MSF contains approximately 3,735 acres of hardwood and softwood forests in portions of Cornwall, Goshen, and Litchfield. The Department of Energy and Environmental Protection (DEEP) plans to undertake silvicultural treatments on 696 acres, invasive plants treatments on 582 acres, and ensure that all boundaries (approximately 38 miles) are marked to help prevent unauthorized use.

Summary

As discussed in more detail below, the Council suggests the following refinements to the draft FMP for the MSF:

- clarify information for Old Forestland Management Sites (OFMS);
- clarify if wetland areas will be identified and clarify how wetlands and vernal pools will be protected;
- clarify “corrective actions” to ensure a “healthy forest”;
- identify state and federally-listed species and include any recommended protective measures that could be employed to minimize any potential impacts;
- clarify information for measures to address invasive species;
- identify measures to address unauthorized/illegal activities; and
- clarify if there would be any potential impacts on cultural resources.

Old-Forestland Management Sites

The draft FMP notes on pages 8, 16, and 39 that approximately 25 percent of the total forest area or 916 acres have been placed in the “Old Forest” management category, which means that area has been designated for passive management to encourage the development of “old-growth” characteristics and that “invasive species control work shall be permitted, but all other active management work will not be scheduled for OFMS areas except where conditions may develop a unique ecological condition that impacts species that are threatened, endangered, or of special concerns. However, on page 28, the draft FMP states that “no active manipulation of forest structure will occur other than perhaps extremely low-impact work to increase structural diversity and accelerate the development of old forest

structure,” which could be interpreted to include more forest management activities than those needed to address conditions that could impact species that are threatened, endangered, or of special concern or treatment of invasive species. Further, page 28 also states that “854 acres of Mohawk have been designated as Old Forest Management Sites,” which differs from the 916 acres noted elsewhere in the draft FMP. The Council suggests that the draft FMP clarify the acreage designated as OFMS and under what conditions forest management activities would be employed in the stands designated as OFMS.

Watercourses, Wetlands and Vernal Pools

The draft FMP also states that “vernal pools will be identified in areas that undergo silvicultural treatments. Forest operation plans specific to each project will recommend practices to protect or enhance vernal pools (Skelly, 2014). Typically, a 50- foot undisturbed buffer will be maintained around vernal pools and wetlands. Best Management Practices will be used.” While the draft FMP addresses the identification of vernal pools, it is unclear if wetlands would be “identified in areas that undergo silvicultural treatments”; if a 50-foot buffer is sufficient to protect vernal pools since the vernal pool envelope (VPE) might extend up to 100 feet from the vernal pool depression; and what “Best Management Practices” will be used to protect vernal pool obligate species. The Council suggests that the draft FMP include additional information regarding how wetland areas and any vernal pools would be identified and protected in the areas that would receive active forest management and invasive species control, and reference the appropriate Vernal Pool Best Management Practices.

The draft FMP also states that “there are many streams, mostly unnamed, which flow off Mohawk Mountain before joining tributaries to these rivers, as well as some which flow through some of the outlying parcels of the Forest.” While the draft FMP states that “consistent with Riparian Corridor Protection Policy Statement, a minimum 100-foot undisturbed buffer zone should be maintained around perennial streams”, it is unclear how intermittent watercourses and/or perennial watercourses that are not identified as a fisheries resource would be protected in the compartments/stands that are designated to receive active forest management. The Council suggests that the draft FMP includes a reference to the “Riparian Corridor Protection Policy Statement” and additional information regarding protective measures to better protect water quality for both intermittent and perennial watercourses.

Forest Health

The draft FMP includes a section on “forest health” that includes a statement that “the effects of disease on the forest should be monitored so that corrective action can be taken if necessary.” However, other than the control of invasive plants and “applying silvicultural treatments that create and maintain vigorous stands of diverse species and age classes,” it is unclear what corrective actions, if any, could be undertaken to address diseases or insects within the MSF. Further, the draft FMP notes that “treating diseases in the forest setting is usually impractical due to the scale of treatment needed.” The Council suggests that the draft FMP includes additional information on corrective actions that could be undertaken to address problems with forest health.

Wildlife

The draft FMP includes a section on “Critical Habitat (State-listed Rare or Endangered Plants and Animals)” that includes a statement that “proposed silvicultural treatments are routinely reviewed by the Natural Diversity Database.” And while the draft FMP notes the potential presence of certain state-listed species that would benefit from young forest habitat, it is unclear if state and federal endangered, threatened, or special concern species that are known to occur in the compartments/stands that are designated to receive active forest management have been identified and if specific protective measures have been recommended by DEEP’s Wildlife Division. The Council suggests that the draft FMP includes additional information on known state and federal endangered, threatened, or special concern species that might be present and any recommended protective measures, such as time of year restrictions on tree removal, that could be employed to minimize potential impacts from the proposed forest management activities, similar to the recommendations and best management practices identified for “Fisheries Habitat”.

Invasive Species

The draft FMP notes that “invasives are present throughout Mohawk at low densities and are present in moderate to high densities around wet areas, roadsides, and waterbodies” and that “as invasive plants continue to become more prevalent, the importance of treating invasives both before and after silvicultural activities will only increase.” The Council suggests that the draft FMP includes additional information regarding where and how invasive species will be managed and if pesticides might be applied. If so, the Council recommends coordination with DEEP’s Wildlife Division prior to using any pesticides and that the use of pesticides within the MSF should be minimized and applications within 100 feet of watercourses, wetland, and vernal pool resources should be avoided to the extent practicable.

Cultural Resources

The draft FMP includes a section on cultural sites that notes “the historic prevalence of homesteads with small farms is evident today in the many stone walls, cellar holes, old foundations, rusted-out farming implements, and household items found throughout the Forest.” Further, the draft FMP notes the Civilian Conservation Corp Camp Tourney, Cunningham Tower, a historic fire tower, and “many other, smaller historic sites can be easily found by walking through the Forest and along the many old roads.” The Council notes that the draft FMP does not include any information regarding consultation with the State Archeologist and State Historic Preservation Office (SHPO). The Council suggests that the draft FMP includes an assessment of the potential impact(s) of the proposed forest management activities on cultural resources.

Unauthorized/Illegal Activities

The draft FMP states “unauthorized use of off-highway vehicles is rampant throughout the forest” and “the rampant unauthorized use of off-highway vehicles, particularly ATVs, in Mohawk provides an effective method of entry for invasive plants.” The draft FMP also states that “enforcement of Connecticut statutes prohibiting the unauthorized use of off-highway vehicles on public land needs to be a priority for DEEP’s Environmental Conservation police in this area.” 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 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