

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

July 22, 2026

Nathan Piche
Division of Forestry, Bureau of Natural Resources
Connecticut Department of Energy & Environmental Protection (DEEP)
Nathan.Piche@ct.gov

Re: Updated Forest Resource Management Plan — Nathan Hale State Forest: Nathan Hale Block

Dear Nathan Piche,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) for the Nathan Hale State Forest: Nathan Hale Block (NHSF).

NHSF contains approximately 1,538 acres that straddle the town line between Coventry and Andover. The Department of Energy and Environmental Protection (DEEP) plans to undertake silvicultural treatments on 239 acres, invasive plants treatments on 128 acres, and ensure that all 14 miles of boundary are marked to protect the forest from unauthorized use.

Summary

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

- clarify information for Old Forestland Management Sites (OFMS);
- identify wetland areas and vernal pools and clarify how such environmental resources would be protected;
- identify any recommended protective measures for state listed species;
- clarify information for measures to address invasive species;
- clarify extent of core forest and potential impact of forest management activities; and
- clarify if there would be any potential impacts on cultural resources.

Natural Area Preserves (NAP) and Old-Forestland Management Sites

The draft FMP states that “management plans specific to Natural Area Preserves are often drafted to describe all aspects of their condition, use, and management goals and objectives. These aspects are not covered under the scope of the Nathan Hale State Forest management plan.” The draft FMP notes that one OFMS was designated within Nathan Hale State Forest, which consists of 198 acres or approximately 13 percent¹ of the total acreage within the forest and that “the 198 acres is made up of a six-acre hardwood swamp and 192 acres of upland oak and hardwood forest, including the 31 acre NAP and its surrounding 50 acre buffer.” Since the 31 acre NAP and possibly the 50 acre buffer are “not covered” under the scope of the draft FMP, the Council questions whether that acreage should be included in the total percentage of OFMS designated for the NHSF. Further, it is unclear why the

¹ Table 1 on page 9 indicates that there is 119 acres designated as OFMS, which is approximately 8 percent of the total area of the NHSF.

“six-acre hardwood swamp” is included in the designation as OFMS rather than being designated as “wetlands” (see below) or “inoperable areas”. The Council suggests that the draft FMP clarify the acreage designated as OFMS and the total percentage designated as OFMS within the NHSF.

Wetlands and Vernal Pools

The draft FMP notes in Table 1.0 that there are zero (0) acres of wetlands within the NHSF. However, a review of Map D – Forest Type & Size Class and Map E – Special Features appear to depict a few larger areas denoted as “swamp” and these areas are primarily designated as “inoperable” on Map F – Work Plan. It is unclear why there is a designation for “wetlands” in Table 1 if such land is designated as “inoperable”. The draft FMP fails to note how wetlands and vernal pools (if present) will be identified and protected in the areas that would receive active forest management activities and invasive species control. And while the draft FMP includes provisions for the establishment of riparian buffers to better protect fisheries resources, the Council suggests that the draft FMP includes additional information regarding how wetland areas and any vernal pools would be identified and protected in the areas that would receive active forest management activities and invasive species control.

Wildlife

The draft FMP states “sections of Nathan Hale fall within the vicinity of known occurrences of state and/or federally listed endangered, threatened or special concern species” The draft FMP generally identifies the type of species that might be present within NHSF and notes that prior to each proposed timber harvest operation, the Natural Diversity Database (NDDDB) Program will review and provide recommendations and best management practices to minimize adverse impacts to listed species. The Council supports consultation with DEEP’s Wildlife Division since most NDDDB determinations are only valid for a specific time, such as two years. The Council suggests that the draft FMP includes any recommended protective measures, such as time of year restrictions on tree removal, which 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 and Best Management Practices (BMP’s)”.

Invasives

The draft FMP notes that invasive plant species are commonly found throughout NHSF and that “efforts can and should be made to reduce invasive species density.” The draft FMP also states that “treating these plants typically occurs through mechanical or chemical means, or a combination of the two. Mechanical includes mowing, cutting, or pulling and chemical includes the use of herbicides.” The Council supports efforts to eradicate/minimize invasive plant species within the NHSF and recommends coordination with DEEP’s Wildlife Division prior to using any pesticides. Further, the Council suggests that the use of pesticides within the NHSF 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 that the Nathan Hale Homestead, the Strong-Porter House, old foundations, wells, and numerous stone walls are found throughout the forest. The draft FMP states that “during forest management operations all actions necessary should be made to avoid the destruction of stone walls to preserve these cultural landmarks within the state forest.” The Council supports efforts to “avoid the destruction” of cultural resources and suggests that DEEP consult with the State Archeologist and State Historic Preservation Office (SHPO) and include any assessment and additional information in the draft FMP regarding the potential impact(s) of any proposed forest management activities on cultural resources.

Core Forests

The draft FMP fails to identify if any portions of the NHSF are considered core forest, consistent with Connecticut General Statutes Section 16a-3k. If present, 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” be added to the draft FMP and that the definition of core forest match the statutory definition identified in Section 16a-3k.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Aresta
Executive Director

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