



STATE OF CONNECTICUT

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VIA ELECTRONIC MAIL

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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

Re: Nye-Holman 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 Nye-Holman State Forest (N-HSF).

The N-HSF contains approximately 906 acres of hardwood, mixed wood, and softwood forests within the towns of Tolland, Ellington, and Willington. The draft FMP identifies various forest management activities that would be implemented over the next 10 years on over 900 acres. These land management activities would include silvicultural treatments on 170 acres; treatment of invasive plants on up to 221 acres; improving 1.6 miles of roads; and marking all boundaries (approximately 94,000 linear feet) of the forest.

Summary

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

- consultation with the State Archeologist and State Historic Preservation Office (SHPO) regarding cultural resources;
- explanation for the rationale used to select the 225 acres that are designated for Old Forestland Management;
- identification of wetland areas and vernal pools and inclusion of a description of how such environmental resources would be protected;
- identification of the characteristics of a healthy forest and how such information/determination is used in making forest management decisions;
- identification of specific forest management activities that could address the potential long-term restoration of ash trees;
- identification of resiliency measures for climate change and how storm/wildfire damage would be handled (contingency plan) in the event of a significant storm and/or wildfire;
- clarification on the use of pesticides/herbicides and potential impacts to core forest;
- identification of any recommended protective measures that could be employed to minimize any potential impacts to state and federally-listed species; and
- clarification of certain definitions and figures.

Cultural

The draft FMP notes that “the land which currently comprises Nye-Holman State Forest was originally occupied by the Mohegan and Nipmuck tribes.” However, the draft FMP does not include any information regarding consultation with the State Archeologist and SHPO to determine if there are cultural resources within the N-HSF. The Council suggests that DEEP consult with the State Archeologist and SHPO to determine if there are any cultural resources within the N-HSF that could be impacted by the proposed forest management activities. If so, it is suggested that such information and any recommended protective strategies be included in the FMP.

Old-Forestland Management

The draft FMP notes that approximately 50 percent or 547 acres have been placed in the “active forest” land classification category, which means that “active management techniques can be used to manage a diverse and vigorous forest resource.” The draft FMP also notes that 25 percent or 225 acres have been placed in the “Old Forest” management category, which means that “active manipulation of vegetation will not occur, except perhaps the eradication of invasive plants.” The Council notes that the 225 acres designated as “Old Forest” is significantly more 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. The Council suggests that the draft FMP include a discussion that explains the rationale used to select the 225 acres that are designated for Old Forestland Management in this FMP

The chart on Page 33 accounts for 100 percent of the forest acres in the N-HSF, including those areas that are designated as inoperable, inaccessible, and “Old Forestland Management”. The Council notes that the heading of the chart “Acres to be Managed” could be confusing to some readers since people might assume that “Acres to be Managed” is an action or activity that might not include passive management (i.e. “allow to develop”). This confusion or misconception might be reinforced by the title of the chart, which is identified as “Table 3: Acres to be managed by silvicultural system within Nye-Holman State Forest”, since “silvicultural system” is defined in the FMP as “a planned process whereby a stand is tended, and re-established.” The Council suggests that the draft FMP clarify that the chart includes both active and passive management (notwithstanding control of invasive plants). It is also suggested that this chart could be used to indicate the total area (acres) within each of the listed forest cover groups that are to be managed as “Old Forestland Management”, which could be accomplished by adding a separate column heading for “Old Forestland Management” while also deducting the “Old Forestland Management” area from the “Allow to Develop” category. Providing information on how much “Old Forestland Management” area there is in each cover group would be of service to an interested reader.

Lastly, the Council notes that the FMP refers to “Old Forest Management” and “Old Forestland Management” throughout the document, which is assumed to be the same; however, neither term is included in Appendix C – Glossary. The Council suggests that one term be used to avoid confusion for the reader, and that a definition for that term be included in Appendix C – Glossary.

Watercourses, Wetlands and Vernal Pools

The draft FMP identifies the Bonemill Brook, Roaring Brook, Grapeville Brook, the Willimantic River, and other unnamed streams as surface water features within the N-HSF; however, areas of wetlands and any vernal pools within the compartments designated for active silvicultural treatments are not identified or depicted in the draft FMP. The Council suggests that the draft FMP identify and depict wetland areas and vernal pools in the stands that are designated to receive active forest management practices. And while the draft FMP notes that some riparian corridors would be protected with an undisturbed 100-foot “no-cut” buffer near certain surface waters, 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 for the areas that would receive active forest management and invasive species control, especially for compartments 1, 2, and 4.

Forest Health

The Council notes that the draft FMP includes a section on “forest health”, which includes a description of certain diseases and insects that have or could impact trees within the N-HSF. The draft FMP also states that “the effects of disease on the forest should be monitored so that corrective action can be taken if necessary”; however, it is unclear by whom or how the forest would be monitored. Further, it is unclear what a healthy forest is, or what the characteristics are of a healthy forest and its importance in forest management decisions, since the draft FMP states that “the presence of diseases is not an issue in and of itself as the complex structure created by the death and decomposition of some trees within the forest can significantly improve wildlife habitat, nutrient cycling, and invertebrate diversity.” The Council suggests that the draft FMP include a description of a healthy forest and/or what the characteristics are of a healthy forest and how that determination is used in making forest management decisions.

The Draft FMP notes that the Elm-Ash-Red Maple cover group makes up 134 acres, or roughly 15 percent, of the forest within N-HSF. The draft FMP also states that Emerald Ash Borer (EAB) “is present throughout Nye-Holman State Forest wherever there are ash trees, although most ash appear to have already died from EAB.” Given the recent introduction of biocontrols to help combat EAB in Connecticut’s forests, the Council suggests that the draft FMP include information regarding specific forest management activities that could address the potential long-term restoration of ash trees within the N-HSF including, but not limited to, 1) monitoring, and 2) protection of white ash seedlings and saplings.

Storms

Climate change predictions are that extreme weather events, such as those that occurred in Connecticut October 2011 (early fall snowstorm) and increased wildfire activity, such as the state experienced in 2024, are likely to continue on into the future. The draft FMP states that several tropical storms have impacted Connecticut since the writing of the last FMP and that “frequent windstorms and microbursts have shaped and continue to shape [*sic*] Connecticut’s forests by blowing over trees individually or in small groups.” The draft FMP also states that “these events cannot be planned for and seldom require intervention after the fact, but any necessary management activities will be considered at the time.” The Council suggests that the draft FMP include a discussion on resiliency measures for climate change and how storm/wildfire damage would be handled (contingency plan) in the event of a significant storm and/or wildfire that impacts the N-HSF.

Pesticides

The draft FMP states that in Compartments 1, 2, 3, 4, 15, 16, 25, and 29, which are compartments that have or abut water features that support fisheries resources, any herbicides applied within 50 feet of a watercourse “should be restricted to those designed for use in and around aquatic systems.” For Compartment 21, the special condition for the application of herbicides would be 100 feet, and for Compartment 24 it would be 75 feet due to the steep terrain. It is unclear why there is such variability in the buffer distance for the application of herbicides described in the draft FMP. The Council recommends that the use of herbicides and pesticides within the N-HSF should be minimized and applications within 100 feet of watercourses, wetland and vernal pool resources should be avoided to the extent practicable.

Core Forests

The draft FMP fails to identify if any portion of the N-HSF is considered core forest, consistent with Connecticut General Statutes (CGS) 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” in Appendix C – Glossary match the statutory definition identified in CGS Section 16a-3k.

Wildlife

The draft FMP notes that a National Diversity Database (NDDDB) determination was received on February 22, 2024, which identified “three turtle species of special concern, one snake species of special concern, two bird species of special concern, one fish species of special concern, one invertebrate of special concern, one critical habitat, and four plants (one endangered, one threatened and two of special concern).” The Council

notes that the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (IPaC) indicates that tri-colored bat (TCB), a species proposed for official listing as endangered, and small whorled pogonia, a species listed as threatened, might occur within the N-HSF. The draft FMP also states that “these species can be negatively affected when forestland is fragmented or converted to other uses, and may be negatively affected if forest operations take place during their active or breeding season...” It is unclear if Appendix D - Supplemental Wildlife Information (Fact Sheets) would include specific provisions for the protection of state and federal-listed species. Consequently, the Council suggests that the draft FMP include 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.

The Council notes that Map C-Site Quality Map 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 definition and/or description of the criteria for the designation of areas depicted as high, medium, and low on the “Site Quality Map”.

The Council notes that the draft FMP includes a definition for “stand” but not “compartment”. The Council suggests that a definition for “compartment” be added to Appendix C – Glossary.

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

Sincerely,

A handwritten signature in black ink that reads "Paul Aresta". The signature is written in a cursive, flowing style.

Paul Aresta
Executive Director