



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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VIA ELECTRONIC MAIL

March 25, 2026

James Halleran
Bureau of Natural Resources – Division of Forestry
Connecticut Department of Energy & Environmental Protection (DEEP)
79 Elm Street, Hartford, CT 06106-5127
James.Halleran@ct.gov

Re: Forest Resource Management Plan - Quaddick State Forest

Dear James Halleran,

The Council on Environmental Quality (Council) provides the following comments regarding the draft Forest Resource Management Plan (FMP) - Quaddick State Forest (QSF)

The QSF contains approximately 573 acres of hardwood, mixed wood, and softwood forests in four (4) distinct and separated compartments within the towns of Thompson, Putnam, and Killingly. The draft FMP identifies forest management activities that would be implemented over the next 10 years including silvicultural treatments on 180 acres, invasive plants treatment on 116 acres, and all property boundaries (approximately 58,000 linear feet) will be marked to prevent unauthorized use of the forest.

Summary

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

- consultation with the State Archeologist and State Historic Preservation Office (SHPO) regarding cultural resources;
- clarification of “Old Forestland Management” designations;
- 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 and minimize deer browse;
- 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 Map C – Site Quality Map.

Cultural

The draft FMP notes that “the land which currently comprises Quaddick State Forest was originally occupied by the Mohegan and Nipmuck tribes” and that “there are no specific places within Quaddick State Forest which have great cultural significance.” However, the basis for such a statement is unclear since the draft FMP does not include any information

regarding consultation with the State Archeologist and State Historic Preservation Office (SHPO) to determine if there are cultural resources within the QSF. The Council suggests that DEEP consult with the State Archeologist and SHPO to determine if there are any cultural resources within the QSF that could be impacted by the proposed forest management activities in Compartments 1 and 2. If so, it is suggested that such information and any recommended protective strategies be included in the draft FMP.

The Council notes that the chart on Page 30 accounts for 100 percent of the forest acres in the QSF, including those areas that are designated as inoperable and “Old Forest Management”. The Council also notes that the heading of the chart “Acres to be Managed” could be confusing to some readers who might assume that “Acres to be Managed” is an action or activity, which 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 Quaddick State Forest”, since “silvicultural system” is defined in the draft FMP as “a planned process whereby a stand is tended, and re-established.” The Council suggests that the chart/table 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 draft FMP refers to “Old Forest Management” and “Old Forestland Management” throughout the document, which is assumed to be the same. And while the term “Old Forest Management Sites” is defined in the narrative, 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 also be included in Appendix C – Glossary.

Forest Health

The Council notes that the draft FMP includes a section on “forest health” and a description of certain diseases and insects that have or could impact trees within the QSF. 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 includes 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 13 acres, or roughly 2.5 percent, of the forest within QSF. The draft FMP also states that Emerald Ash Borer (EAB) “is present throughout Quaddick State Forest wherever there is ash, 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 QSF including, but not limited to, 1) monitoring, and 2) protection of white ash seedlings and saplings, especially in stands 1-5 and 4-1, which still have surviving ash trees.

The draft FMP notes that the QSF includes 165 acres of the Oak-Hickory cover group and 230 acres of the Oak-Pine cover group, which are browsed preferentially by white-tailed deer. The draft FMP also states that “the spongy moth caterpillar is an early-season defoliator which eats the leaves of primarily oak trees” and that “between outright mortality from spongy moth defoliation and mortality from secondary pests, this most recent outbreak caused significant mortality in some areas of Quaddick State Forest.” While the draft FMP identifies strategies to “prevent excessive herbivory” or deer browse, it is unclear if any of these

strategies will be employed within the QSF, especially in stand 1-7 , which experienced almost 100 percent mortality from spongy moths. The Council suggests that the draft FMP identify if any stands subject to active management would employ strategies to reduce deer browse and what those strategies might be to encourage regeneration of impacted tree species.

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 into the future. The draft FMP states 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 includes 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 QSF.

Pesticides and Herbicides

The draft FMP states that one of the main “Management Goals” of the draft FMP is to “control invasive species to prevent degradation of ecosystem function” and that “there are also some places where invasives are densely established, most notably along roadsides, near drainages in the eastern half of compartment 1, and in compartment 4.” The draft FMP also notes that invasive treatments are recommended for those compartments and “in other stands throughout the forest which either have notable densities of invasive plants or are scheduled for active management that might otherwise allow invasive plants to become more densely established.” Although the method of invasive plants treatment, mechanical and/or chemical, is not specified in the draft FMP, the Council recommends that if the use of herbicides and pesticides within the QSF is proposed, such use 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 states that “compartment 3 is an upland mixed hardwood forest and is within a large block of unfragmented core forest”; however, it is unclear if other compartments/stands are considered core forest, based on the definition provided in Connecticut General Statutes (CGS) Section 16a-3k. The Council suggests that the draft FMP identify all compartments/stands that would meet the statutory definition of “core forest,” and 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 May 28, 2024, which identified “one turtle species of special concern, one fish species of special concern, one endangered invertebrate, and four plants (two endangered, one threatened and one of special concern).” 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, a species listed as endangered, and tri-colored bat (TCB), a species proposed for official listing as endangered, might occur within the QSF. 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...” Although the draft FMP states that “prior to each proposed timber harvest operation, the NDDDB Program will review and provide recommendations and best management practices to minimize adverse impacts to listed species,” 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 whether the site quality refers to the health and quality of the growing stock or what criteria have 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".

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 style with a long horizontal flourish at the end.

Paul Aresta
Executive Director

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