



STATE OF CONNECTICUT

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VIA ELECTRONIC MAIL

June 25, 2025

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

Re: Meshomasic State Forest, Mountain Block - Updated Forest Resource Management Plan

Dear Nathan Piche,

The Council on Environmental Quality (Council) provides the following comments regarding the Updated Forest Resource Management Plan (FMP) for the Meshomasic State Forest - Mountain Block.

The Mountain Block, which comprises 6,393 acres located in the towns of Portland, East Hampton, Glastonbury, and Marlborough, is one of two blocks that make up Meshomasic State Forest. The draft FMP identifies various land management activities, including:

- silvicultural practices on 825 acres, primarily consisting of even-aged treatments;
- maintaining 1,396 acres as Old Forestland Management Sites (OFMS);
- eradicating invasive plants on 146 acres; and
- maintaining grassland and shrubland areas to retain early successional and edge habitats.

Wetlands, Watercourses, and Vernal Pools

The draft FMP states that “the extensive network of forested wetlands, intermittent streams and brooks that flow out of this block make the Mountain Block a vital piece of forestland in the context of watershed protection and management.” Further, the draft FMP states that some of the streams within the Mountain Block “support a high-quality cold-water fish community primarily comprised of fairly robust native brook trout populations and in addition, they function to provide cold, clean, and unpolluted waters to downstream areas of a watershed, which support increased diversity of aquatic organisms.” However, the draft FMP includes no provisions for riparian buffers, and it is unclear what protections and best management practices would be employed proximate to watercourses, wetlands and vernal pools, if present. The Council suggests that the draft FMP include provisions that specify how watercourses,¹ wetland areas, and vernal pools would be identified and protected in the stands designated for active forest management.

The Council also suggests that DEEP include provisions in the FMP to establish a 100-foot buffer around all identified wetlands and vernal pools (vernal pool envelope), limit forest management activities near vernal pools during the vernal pool obligate species’ breeding season, and incorporate best development practices for “site clearing, grading, and construction activities” referenced in the *Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States*.²

Wildlife

The draft FMP notes that “the Mountain Block supports a wide range of wildlife associated with forested habitat. Sections of the Mountain Block fall within the vicinity of known occurrences of state and/or federally listed endangered, threatened or special concern species.” Indeed, the National Diversity Database (NDDDB) determination, received October 12, 2022, identified “one state endangered species, two turtle species of special concern, two bird species of special concern, one fish species of special concern, three freshwater mussel species (one endangered and two special concern), and three additional invertebrate species (one endangered and two special concern).” The United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation tool (IPaC) indicates that northern long-eared bat (NLEB), a species that has recently been reclassified as “endangered” under the Endangered Species Act, and small whorled pogonia, a species that is listed as “Threatened”, might occur in the vicinity of the Mountain Block. Although the draft FMP states that “any timber harvesting done in the Mountain Block will be limited to the dormant season of the listed species above and/or will use best management practices outlined by the NDDDB Program for conducting work in the forest while minimizing adverse impacts to listed species”, there is no mention what those “best management practices outlined by the NDDDB Program” are and it is unclear if a more current NDDDB determination would be sought prior to the proposed forest management activities. The Council supports DEEP’s proposed efforts to coordinate with the Wildlife Division “in planning and conducting management within State Forests”. The Council suggests that the draft FMP include a description of all recommended protective measures provided by NDDDB, such as time of year restrictions on tree removal, that could be employed to minimize any potential impacts on the known state and federally listed species within or near the stands designated for active forest management.

Invasive Species

The draft FMP states that “invasive plants are addressed so they do not suppress forest regeneration efforts”, which would be done by both mechanical and chemical means. The draft FMP also states that “chemical treatments tend to be most effective as they can target individual plants or large groups and are effective at killing an entire plant above and below ground.” The Council supports the elimination or suppression of invasive species. The Council notes that a public drinking supply water watershed for the Portland Water Department is within the Mountain Block. The Council suggests that the draft FMP include provisions to 1) limit the use of herbicides within 100 feet of wetland and vernal pool resources, and 2) ensure that such applications be strictly controlled and applied by a state-licensed pesticide/herbicide applicator.

The Council notes that the definition of wetlands in the draft FMP is inconsistent with the statutory definition for wetlands as detailed in Connecticut General Statutes Section 22a-38 (15). The Council suggests that the draft FMP also include the statutory definition for wetlands.

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

Sincerely,



Paul Aresta
Executive Director

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

¹ The DEEP Fisheries Division Riparian Corridor Protection policy recommends a vegetated buffer of at least 100 feet around perennial watercourses and 50 feet around intermittent watercourses; <https://portal.ct.gov/-/media/DEEP/fishing/restoration/RiparianPolicypdf.pdf>.

² Calhoun, A. J. K. and M. W. Klemens. 2002. Best development practices: Conserving pool-breeding amphibians in residential and commercial developments in the northeastern United States. MCA Technical Paper No. 5, Metropolitan Conservation Alliance, Wildlife Conservation Society; <https://www.nae.usace.army.mil/Portals/74/docs/regulatory/VernalPools/BestDevelopmentPractices20Oct2014.pdf>