



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

Keith Ainsworth
Acting Chair

Timothy J. Bishop

Linda Bowers

Christopher Donnelly

David Kalafa

Aimee Petras

Denise Rodosevich

William Warzecha

Paul Aresta
Executive Director

VIA ELECTRONIC MAIL

June 25, 2025

Jill Humphreys
Division of Forestry, Bureau of Natural Resources
Connecticut Department of Energy & Environmental Protection (DEEP)
Western District Headquarters
2065 Thomaston Road, Watertown, CT 06795
Jill.Humphreys@ct.gov

Re: Mattatuck State Forest, Cave - Black Rock Block - Updated Forest Resource Management Plan

Dear Jill Humphreys,

The Council on Environmental Quality (Council) provides the following comments regarding the Updated Forest Resource Management Plan (FMP) for the Mattatuck State Forest (MSF) - Cave - Black Rock Block (C-BR Block).

The C-BR Block of the MSF, which comprises 1,363 acres, is located along Watertown's eastern border (1,252 acres) and Thomaston (111 acres). The draft FMP identifies various land management activities, including:

- 223 acres with irregular shelterwood harvests, 94 acres with selection harvest, and 30 acres will undergo timber stand improvement;
- improving approximately 1.53 miles of existing gravel forest road; and
- constructing approximately 0.4 miles of road.

Wetlands and Vernal Pools

The draft FMP notes that "there are several vernal pools scattered throughout this Block, including in stands scheduled for active work in the next ten years. A minimum 50-foot undisturbed buffer will be maintained around vernal pools and wetlands, unless they are located within 50 feet of established forest access roads." The Council supports efforts to minimize potential impacts to wetlands and vernal pool obligate species. The Council suggests that DEEP consider implementing 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.*¹

State and Federally Listed Species

The draft FMP states that a Natural Diversity Database (NDDB) determination was received on March 1, 2024, that "identified seven State-listed animal species and five State-listed plant

species (RCSA on Sec. 26-306) that may be found in the Block.” Further, the draft FMP notes that there is one State and Federally Endangered mammal, one State Endangered reptile, one State Threatened reptile, one State Threatened amphibian, and three reptile species of 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 tri-colored bat (TCB), a proposed threatened species, have the potential to be within the C-BR Block. Although the draft FMP states that “DEEP Divisions of Forestry and Wildlife will **consider** (emphasis added) recommendations provided by NDDDB when planning management activities,” the Council suggests that the draft FMP include 1) 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, and 2) an affirmative statement that all forest management activities would adhere to NDDDB’s recommended protective measures.

Core Forest

The draft FMP notes that areas of the C-BR Block are part of small (<250-acre), medium (250 to 500-acre), and large (>500-acre) core forest. The draft FMP states that “none of the forested areas of this Block will be converted to non-forested use as part of this plan.” However, the draft FMP states that “approximately 2,100-foot access road will be built from Black Rock Road, in collaboration with the Town of Watertown, to access Stand 2-20.” Since few details were provided regarding the proposed access road, the Council questions if the creation of the proposed access road would fragment an existing core forest block. The Council suggests that the draft FMP clarify if the proposed access road within the C-BR Block would be a conversion of a forested area to a non-forest use and if such conversion would “significantly affect core forest”. If so, the Council suggests that DEEP assess alternatives that would not result in the fragmentation of core forest.

Invasive Species

The draft FMP states that “non-native invasive plants are present, primarily in wetland areas, old fields, and along roads and trails” and “invasive plants will be treated in areas scheduled for management activities.” However, it is unclear how the invasive plants would be treated – whether by mechanical and/or chemical treatments (herbicides). The Council supports the elimination or suppression of invasive species. The Council notes that the Reynold’s Bridge aquifer protection area is partially within the C-BR Block. The Council suggests that the draft FMP clarify if herbicides would be used to control invasive plants, and if so, that the draft FMP include provisions to 1) limit the use of herbicides within 100 feet of wetland and vernal pool resources, and 2) that such applications be strictly controlled and applied by a state-licensed pesticide/herbicide applicator.

The Council suggests that a definition for “irregular shelterwood” be included in Appendix C (Definitions).

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
Gerard Milne, DEEP

¹ 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>