



## Salisbury Association

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April 18, 2024

Salisbury Association, Incorporated's Comments on the Centennial Watershed State Forest, Lakeville Reservoir Block Management Plan

Thank you for the opportunity to provide comments on the Centennial Watershed State Forest, Lakeville Reservoir Block Management Plan ("the Plan")

As you know, the Salisbury Association, Incorporated (SA) owns the 241-acre Yoakum Preserve that adjoins the Lakeville Reservoir Block of the Centennial Watershed State Forest, as well as a Right of Way that passes over the State Forest.

SA is very concerned about the effects of the Plan on our property, our public hiking trail, the ecology of the area, and the drinking water for our community.

We support several components of the Plan. In particular:

- Eradicating invasive exotic plants to allow regeneration of native species
- Regulated deer hunting - with the caveat that hunting should not be allowed within shooting range of our public hiking trail
- Setting aside 179 acres of Old Forestland Management Sites to allow natural processes to occur without the influences of active forest management.

We oppose the proposal to log 94 acres of forest that provides crucial ecological function and protection for the town's drinking water.

SA has placed a "forever wild" conservation easement over our Yoakum Preserve, to ensure that this extraordinary block of core forest will continue to protect headwater streams and drinking water watershed and will grow back into old growth forest without human manipulation. According to Highstead's goals articulated in its 2017 Wildlands and Woodlands, Farmlands and Communities, 70% of New England should be protected as forest by 2060, with a tenth of that forestland preserved as wildlands. Today, less than one percent of Connecticut is protected as wildlands. SA believes that perpetual organizations such as SA, TNC, and Aquarion are best positioned to provide perpetual wildland protection, and that we should do so in areas of core forest that protect drinking water resources.

The ultimate purpose of the Plan and of this part of the State Forest is to protect the water quality of Salisbury's drinking water. This is why you do not allow public access on most of the block, and why you insisted on protections such as no dogs on SA's public hiking trail. Yet you want to ignore this protection and log 94 acres of land that is too sensitive to allow hikers. Your plans to

log in a place where you allow no public access are utterly antithetical to the purpose of protecting our drinking water. The very reasons for prohibiting public access should also determine that using heavy logging equipment and removing the very trees that absorb runoff and filter water should not be allowed.

The purest water comes from dense, unmanipulated forest. Logging the property will open up the canopy, allow rain impingement directly on the forest floor, and increase overland flows. Skidder/harvester activity will macerate the forest floor. All of these lead to increased sediment and nutrient transport that will likely negatively impact the town's water supply.

This entire block is core forest, defined as forest that is more than 300 feet from the forest/nonforest boundary. Core forest area has declined by more than 15 percent over the last 35 years in Connecticut. Fragmentation of core forests diminishes their water purification and habitat values and can result in heavier runoff. Dividing the forest with clearings caused by logging invites invasive plant species as well as edge predators that diminish breeding success for bird species that require dense, unfragmented forest. Edge forests comprise the majority of forest type in Connecticut – we do not need to create more of them.

Core forests have seen the greatest percentage decline of Connecticut forest types since 1985. Declining core forest accelerates the decline of species that depend on unfragmented interior forest, such as fisher, moose, and many species of birds including northern goshawk, cerulean warbler, ovenbird, and scarlet tanager.

The trees the Plan proposes to extract – especially red oak – are precisely those that best support wildlife. Studies have shown that each oak tree can host over 500 species of caterpillars that provide food needed by birds and other wildlife to feed their young. Oaks also provide shelter and huge amounts of acorns in the fall that help wildlife survive the winter. When trees die and are not removed, they provide cavities for shelter and nutrients for insects, fungi, and other trees. Removing these important sources of food and shelter can only exacerbate the biodiversity crisis in which insects, birds, and other wildlife species are experiencing dramatic declines.

The mature trees in the forest are working hard to store and sequester carbon. Combatting the climate crisis requires that they be left alone to do their work. Studies by scientists from The Nature Conservancy show that timber harvesting in the northeast results in an immediate loss in carbon storage and sequestration that cannot be replaced even by 30 years of new forest growth. We need these trees now.

The Plan does not address many of the specific aspects of this particular block. Instead, it deals in platitudes and generalities and seems to be cut and pasted from management plans for parts of the Centennial State Forest in other areas of the state. But Salisbury's northwest corner is not like other parts of the state. Salisbury is part of the Appalachian Trail wildlife corridor that connects Georgia to Maine. Salisbury is in an area of high climate resilience and flow identified by The Nature Conservancy. Salisbury's forests have many characteristics of northern woodlands that are not present in other parts of the state. According to Michael Klemens, co-author of a recent DEEP publication, Salisbury may be the last refuge in Connecticut for species that depend on cooler, higher elevation habitats. The Plan does not address the consequences of disturbing and fragmenting this critically important habitat.

In another example, on Page 1, under Environmental Protection, the Plan states that “the complex canopy structure that will result from forest management... will delay peak storm flows and will minimize nutrients, sediment and pollution from entering the water system”. The Plan does not identify any flooding or nutrient export problems on the property – and there are none. The platitudes about increasing diversity of the forest are contradicted by the tree diversity that already exists, by the tree diversity that a naturally growing forest with natural disturbances furthers, and by science. Studies have shown that protected forests have greater tree diversity and richness than forests that are exposed to management and harvesting. Your proposed logging is unlikely to produce a more structurally and compositionally diverse (i.e., "climate resilient") forest.

Nor does the Plan explain how the proposed logging is consistent with the conservation easements on the property. The easements held by DEEP state the value of *mature* forest for protecting the town’s drinking water, emphasizes the land’s public service functions, and prohibits commercial uses. Both conservation easements state that their purpose is “to assure that the Property will be retained forever predominantly in its natural, scenic, forested, and open space condition and as an important water supply area and as mature, diverse and healthy forest, protecting biological diversity . . .” The easements in fact prohibit the “cutting, removal or destruction of trees” except as *expressly permitted* pursuant to a Natural Resources Management Agreement. The Plan does not explain whether or how its “cutting, removal, and destruction” of trees on 94 acres are expressly permitted under these documents.

Unfortunately, the State does not have a stellar reputation in our area for good forest management. We have seen the devastation they have wrought at our state parks in the guise of salvage harvesting and removing hazard trees. Salvage and hazard trees are not mentioned in the Plan: Instead, the Plan asserts that somehow killing massive numbers of trees over 94 acres will improve the ecology of the forest and its water supply protection functions. We cannot help but be suspicious that this is a smokescreen for a commercial harvest motivated by revenue and not by protecting the drinking water and ecology of the area.

In sum, the Salisbury Association opposes the Plan’s proposals to log 94 acres of the Centennial State Forest that borders our forever wild property. We urge DEEP, The Nature Conservancy, and Aquarion to revise the Plan to conserve the entire block as wildlands.

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