## LAND USE OFFICE

Telephone: 860-435-5190 Fax: 860-435-5172 Email: landuse@salisburyct.us



Town Hall
P.O. Box 548
27 Main Street
Salisbury, Connecticut 06068

July 22, 2024

Salisbury Conservation Commission

Re: Centennial Watershed State Forest Lakeville Reservoir Block Management Plan

To Whom It May Concern:

The Salisbury Conservation Commission is responsible for administering Connecticut General Statutes Chapter 97 Section 7-131a, for the purposes of development, conservation, supervision, and regulation of natural resources, including water resources.

The Conservation Commission appreciates the opportunity to comment on the *Centennial Watershed State Forest - Lakeville Reservoir Block Management Plan 2024-2034.* The Commission took the following actions:

- On May 9th, it held a regular meeting where the plan was discussed with Curtis Rand, First Selectman.
- On June 14th, it held a site visit to tour zones 6, 7, and 8 of the Lakeville Reservoir Block of the Centennial Watershed with the authors of the Management Plan from DEEP, Gerard Milne and Jill Humphreys; a representation from Aquarion Water, Joseph Walsh; and a representation from The Nature Conservancy, Cynthia Fowx.
- On July 3rd it held a special meeting with above-mentioned members of DEEP, Aquarion and The Nature Conservancy to address any residual questions from the Commission.

At the June 14th site visit, Milne and Humphreys presented specific evidence to support descriptions used in the plan about the health of the forest to be managed. For example, the Commission observed:

- A stand of even-age maples in zone 6, whose tops had generally been forked at about the same height, as described on page 20 of the DEEP Plan.
- The decaying stumps of the red pines which were planted in the 1920s by the Lakeville Water Company to improve water filtration and removed in the early 2000s due to infestation and disease, which is described on page 9.
- Small understory plants in zone 7 and 8 whose tops had been browsed by deer.
- Japanese barberry, bittersweet, and other invasive plants that were described in the plan.

The Management Plan for the Lakeville Reservoir block of the Centennial Watershed states the following objectives:

## LAND USE OFFICE

Telephone: 860-435-5190 Fax: 860-435-5172 Email: landuse@salisburyct.us



Town Hall P.O. Box 548 27 Main Street Salisbury, Connecticut 06068

- a. Treat invasive exotic plants to allow regeneration of native species.
- b. Institute a regulated deer hunting program to allow native vegetation to regenerate.
- c. Conduct selection harvests on 76 acres, a thinning on 15 acres, and non-commercial Timber Stand Improvement to create more multi-aged forests with a diverse mix of species and age classes.

The Commission's comments on these objectives are as follows.

Re: Objective a.

- It supports the anticipated partnership with Canaan-based Invasive Plants Solutions (IPS), whose mission evolved out of a desire to encourage the growth of native plants that are threatened by invasive plants.
- It acknowledges that to manage barberry and invasive bittersweet on a large scale requires careful training in identification and removal methods, including highly managed applications of legal herbicides.
- It respectfully asks to be advised on the herbicides, their concentration and application to be used and site access during the eradication process.

Re: Objective b.

- According to the 2020 Connecticut Forest Action Plan, "deer are the most damaging animal to forest ecosystems and dynamics" (page 36.)
- The plan recommends a regulated deer hunting program, and we look forward to learning more as these regulations take shape.

Re: Objective c.

Some members of the Salisbury community have expressed concern that timber harvest is in opposition to the goals of healthy forest growth and call for a "forest reserve". We note that:

- Section 1.4 "Reserved Forestland" of the 2020 Connecticut Forest Action Plan states that the term "Old Forestland Management Sites" refers to "forestlands withdrawn from timber utilization by law or administrative regulation." (2020 Forest Action Plan, p. 13.)
- According to the DEEP Plan, 45% of the Lakeville Reservoir Block will be treated as Old Forestland Management Sites, "set aside to allow natural processes to occur... without the influence of active management..." (DEEP Plan, p. 13.)
- These 179 acres will not be managed without the need for additional legislation.
- 30% of the acres in the Lakeville Reservoir Block are deemed inaccessible, and timber harvest in these areas is not part of the current plan.

## LAND USE OFFICE

Telephone: 860-435-5190 Fax: 860-435-5172 Email: landuse@salisburyct.us



Town Hall P.O. Box 548 27 Main Street lisbury, Connecticut 06068

- A total of 91 acres of the block of approximately 400 acres will be managed for thinning, selective harvest, or improvement during the execution of this plan.
- The 2020 Connecticut Forest Action Plan (p.16) and the Lakeville Reservoir Block Management Plan (p. 22) both underscore the need to have diverse vegetation of diverse ages in order to achieve the goal of a healthy, resilient forest.
- At the May 9th meeting, Curtis Rand shared that there are beneficial effects of natural disturbances in a forest, which can be mimicked by the process of harvesting timber.
- The DEEP Plan describes a selection harvest to be "Used in uneven-aged management. Trees are removed singly or in groups up to 1-2 acres." (DEEP Plan, 38).

## The Commission:

- Expects professional conduct with best conservation practices by all timber harvesters and contractors to ensure a positive community experience.
- Wants to ensure that the purpose of a selection harvest to open the canopy and encourage uneven-age growth is not misinterpreted as an opportunity to clear-cut 1-2 acres (DEEP Plan, p. 38.)
- Asks to receive notice when tree selection has occurred, prior to commencement of harvesting work.

The Conservation Commission considers the 2024-2034 Management Plan, as submitted by foresters Gerard Milne, CCF #007 and Jill Humphreys, CCF #1226 to be well-considered and in the best interests of our watershed and the health of the Lakeville Reservoir Block of the Centennial Watershed State Forest, and looks forward to working with DEEP to oversee the careful enactment of the stated objectives of this plan.

Sincerely,

The Salisbury Conservation Commission