

C O N N E C T I C U T
Land Conservation Council

Sent via email: Peter.Hearn@ct.gov

February 7, 2022

Connecticut Council on Environmental Quality

% Peter Hearn, Executive Director

79 Elm Street

Hartford, CT 06016

Dear Peter and members of the Connecticut Council on Environmental Quality,

On behalf of the Connecticut Land Conservation Council (CLCC), I submit these comments regarding DEEP's tree-cutting at Housatonic Meadows State Park, as follows:

1. **Public Notice and an Opportunity to be Heard**: State Parks, Forests, Wildlife Management Areas, and other conservation lands owned by the State are public trust resources: these lands were acquired with an expectation that they would be preserved and stewarded in trust for the benefit of Connecticut's citizens. As such, the public should be notified and given the opportunity to comment prior to projects such as the tree-removal work undertaken at Housatonic Meadows. A public engagement process would allow for input by local stakeholders and independent professionals. It would help to restore the public's confidence in DEEP that there is a system in place to ensure that land entrusted to the state for conservation and recreation will be protected for those purposes to the greatest extent possible. (Note: we contend that this same public input requirement should extend to all public lands that are subject to extensive tree-cutting activities by state agencies.)
2. **Evaluation and Determination of "Hazardous Trees"**: There is compelling testimony submitted by licensed arborists challenging the validity of DEEP's hazard designation of most of the trees that were cut at Housatonic Meadows. See, for example, the written comments of Bruce Bennett, Tree Warden of the Town of Kent, which include many questions he contends should have been answered prior to the "broad scale removal of a stand of trees." At its presentation on January 6, DEEP stated that "hazard tree evaluation and identification criteria were developed to be implemented by agency field staff, who have been trained in the use of these criteria." As suggested by Eric Hammerling of the CT Forest & Park Association in his February 2 written comments, this assessment process should be made by or under the direct guidance of a licensed arborist. It should also include an evaluation of options to mitigate potential hazards and preserve the trees.
3. **Evaluation and Determination of Environment Impacts**: There was considerable public concern regarding the level of consideration given to the environmental impacts of the tree cutting, with respect to wildlife habitat, soil erosion, invasive plant proliferation,



and stormwater runoff/sediment loading of the Housatonic River. A public input process in advance of the project should include a presentation by relevant divisions of DEEP providing an evaluation of environmental impacts of the proposed tree-cutting project, with an opportunity for input from members of the community who are often the most familiar with the resources to be impacted.

4. **Remediation:** Members of the public are seeking information regarding how and when Housatonic Meadows will be remediated. They are asking for a plan, developed in consultation with local experts and organizations, that includes appropriate restoration of the picnic area and riverbank, invasive plant management, erosion and sedimentation controls, and protocols for long-term monitoring and maintenance of the area. We agree. To that end, and consistent with recommendations from the final report from the Forests Sub-Group of the Governor's Council on Climate Change Working and Natural Lands Working Group and, more recently, the Policy for Resilient Forests for Connecticut's Future (PRFCT Future) Working Group, Connecticut should enact a compensatory reforestation policy to mitigate actions by the state and others that result in forest loss, such as the activities that took place at Housatonic Meadows State Park.

At the January 6 public meeting, DEEP staff took responsibility for the lapses in communication and outreach with local organizations and community members before the start of the first round of tree cutting. We appreciate this acknowledgement and hope that it leads to the establishment of a comprehensive and transparent stakeholder engagement process in advance of any future tree cutting projects on public lands.

I appreciate this opportunity to share these comments and all that the CEQ does to protect Connecticut's natural environment.

Sincerely,



Amy Blaymore Paterson
Executive Director