



**TOWN OF OLD SAYBROOK
SELECTMEN'S OFFICE**

RAY ALLEN, DIRECTOR PARKS & RECREATION
CARL P. FORTUNA JR., EX-OFFICIO, FIRST SELECTMAN
WILLIAM HOCHHOLZER, CT DEEP

302 Main Street • Old Saybrook, Connecticut 06475-2384
Telephone (860) 395-3123 • Fax (860) 395-3125

**CONSERVATION MANAGEMENT COMMITTEE (CMC)
HYBRID MEETING
MINUTES
Wednesday, March 23, 2022
11:00 A.M.**

Old Saybrook Town Hall – First Floor Conference Room

Link to recording: <https://youtu.be/FeWCR-qrG88>

I. CALL TO ORDER – All members present

II. COMMENTS FROM THE PUBLIC –

1. Suzanne Thompson of the Gateway Commission spoke: she said the Gateway Commission did contribute to the purchase of the Preserve, that it is an amazing place for vernal pools and human recreation and that she is concerned with timbering and the fracturing of the forest.
2. John Ogren spoke from the Old Saybrook Land Trust. He believes there should be at least a 50% set aside for old growth forest, recognizing the benefit of forest management. Worried that there is less frost in 2022 on the shoreline than ever before and that could cause problems for heavy equipment; also worried about invasives from logging; requested only bow hunting to be allowed.
3. Judy Preston spoke about the unique forest the Preserve is, that having an unfragmented forest is good for migration of species; she cited the Moorhead report and that old growth forest is good for carbon sequestration.
4. Frank Landry spoke – “Preserve the Preserve”
5. Bob Nussbaum from Essex Land Trust spoke about silting from higher tracts of land and is worried about what timbering would do to exacerbate this condition.
6. Ray Allen, Park & Recreation Director spoke that the Ad Hoc Committee felt swept aside with their comments and that they did not feel like the town is being treated as an equal partner. Their letter is attached.
7. Keith Coughlin submitted a letter (attached) which the First Selectman read.
8. Economic Development Commission submitted a letter (attached) which the First Selectman summarized.
9. Peter Fleischert from Essex spoke about how going in the Preserve is quiet and helps you disconnect and that logging roads and guns will disturb this.
10. Bob Friedmann spoke about how logging roads have specific regulations by The Nature Conservancy; 18-foot road and the canopy must be preserved.
11. Another member of the ad hoc committee Sheridan Bauman spoke and echoed the comments of all the above.

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12. Christine Picklo from the Conservation Commission stated she did not like the concept of hunting or logging.
13. Susan Esty from the ad hoc committee talked about the recent walk they went on with DEEP on an old logging road. Logging road scars don't heal very well. She mentioned how the Preserve is used in so many ways by so many. She said the ad hoc committee feels unheard and stressed the cooperative in the title of the CMC.

III. COMMENTS FROM THE AD HOC COMMITTEE

IV. COMMENTS FROM THE COMMITTEE – None at this time.

V. APPROVAL OF MINUTES - December 21, 2022. Motion to approve.

HOCHHOLZER/ALLEN

MOTION CARRIED UNANIMOUSLY

VI. BUSINESS BEFORE THE BOARD

- A.** Update on the Preserve Parking Lots: Route 153 and Ingham Hill Road parking lot and turnaround.
Discussion was had on the shields that should be ready to go by the end of the month. Agreement on a sign at the Ingham Hill Parking area was discussed and agreed upon. Alex Sokolow also reported that a telephone pole and some wires were recently taken down at the 153 lot.
- B.** GEI Preserve Forest Stewardship Plan
For this, the floor was turned over to Michael Klemens, Phd. His report is attached. He suggested that the program proposed by DEEP is being done backwards and he suggested that that core natural areas be identified first and then a plan around those be initiated. Chris Cyder said we all want what is best, core areas should be conserved, use a scalpel, not a chainsaw. There is 20 years of science on this property that needs to be considered. He noted the positive talks the last few days. He does not accept the GEI draft as a guiding document because it sets an intention which is not the intention of the ad hoc group.

Mr. Hochholzer stated that GEI's plan is a guiding document of goals and objectives, that it is a list or recommendations, that the CMC would be voting on specific recommendations that would be implemented from the plan, that an operation plan would be developed for silvicultural operations and project plan for maintenance operations. Any stand to be timbered would be reviewed, by NDDB and all partners, CMC included, and for town review/comment. Any particular stand identified for timbering may only have limited acres to be timbered due to vernal pools/flora/fauna. He finished by asking Dr. Klemens if he would assist in the identification of areas of concern so they could be mapped. DEEP is open to this. He cited other sensitive forests where a good program has been put in place. DEEP's mission is to preserve and protect their assets. Ray Allen further commented that he felt the GEI report was inconsistent and inaccurate with its trail

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system, trails that should be moved or eliminated, and does not show a way to connect to the Essex trail system. Will Hochholzer commented that obviously there was a huge uptick in outdoor trail usage during COVID; query whether we should be looking at trail density applications (Massachusetts has done this). Ms. Esty brought up some freshly cut trees that have been “dumped” in a vernal pool next to the parking lot. She feels they should be left undisturbed for now and that there should be signage saying, “Please don’t move”.

- C. Update on the monitoring and control efforts for invasive weeds. Kathy Connolly spoke about the cutting of Barberry in the Preserve. With volunteers, there has been nearly 100 hours of cutting. Lastly, she commented that, like it or not, nearly every sort of human activity, no matter what it is, spreads invasives in the Preserve.
- D. Discussion and approval of Boundary Tags
There was discussion and it was agreed that, hopefully with the help of some volunteers, boundary tags would be placed in the Preserve. The tags were handed out and agreed upon.

HOCHHOLZER/ALLEN
MOTION CARRIED UNANIMOUSLY

VII. OTHER BUSINESS

VIII. NEXT MEETING DATE – June 22, 2022 at 11:30 a.m.

IX. ADJOURNMENT – Motion to adjourn at 12:45 p.m.

HOCHHOLZER/ALLEN
MOTION CARRIED UNANIMOUSLY

Respectfully submitted,

Carl P. Fortuna, Jr., First Selectman

Letter to CMC March 2022

On March 3rd, the Town of Old Saybrook (Town) and the CT Department of Energy and Environmental Protection (DEEP), received the long-awaited final draft forest management and public recreational use plans for The Preserve from GEI Consultants. Unfortunately, the town's Preserve ad-hoc committee (Committee), charged with representing the Town and its citizenry, and making recommendations regarding the management of The Preserve, has had virtually no input in the making of the final draft plans over the past four years. Therefore, the Committee cannot endorse the plans at this time, and recommends that the Conservation Management Committee (CMC) not accept these plans as final drafts, and more importantly, as final plans. Additionally, we question the sensibility of moving forward with GEI's upcoming public presentation of the draft plans, since the plans suffer from the absence of the Committee's input, and would likely create confusion among the public, abutters, donors, and organizations who fought for 17 years to "Preserve The Preserve".

It is important to note that GEI recently informed the Committee that our review and recommendations would not be considered in the final draft plans, but instead would simply be included in an appendix, along with comments made by the public during the comment period. This was disappointing to the Committee, but we understand that GEI was constrained financially, and could not extend their timeline further.

The Conservation Easement and the Cooperative Management Agreement clearly state that DEEP and the Town, who are equal owners of The Preserve, are to have an equal partnership in the development of the management plans, and equal participation in the future management of the forest. So far, the Committee does not believe this has been the case. Moving forward, we hope to have regular and meaningful participation in the development of the final 10-year forest management and recreational use plans.

On February 24th, the Committee met with Will Hochholzer and several DEEP representatives to review a list of questions and ideas we developed following the submission of our letter in December 2021 to the CMC, which described our significant concerns about DEEP's intentions to pursue active timbering throughout The Preserve, and allow hunting. We were thankful to have DEEP explain the reasoning behind their intended course of actions, however, by the end of the meeting it was deflating to realize all of the Committee's ideas were considered undesirable or unfeasible. Our following key ideas/recommendations were not accepted by DEEP: a) set aside a significant portion of The Preserve to be preserved and managed as an Old Forest Management Area; b) use animal power for timbering to minimize negative impacts of heavy machinery; c) better protect vernal pools by not allowing canopy removal within the 100 foot zone; and d) prohibit hunting, or restrict hunting to bow-hunting, or perform managed culling hunts. The Committee has safety concerns related to firearms, and believes hunting will dissuade recreational use for a significant portion of the year.

Underlying our recommendations above is the Committee's strong belief that The Preserve is a very *unique*, coastal forest, which has been extensively documented by several scientists to have an exceptional array of flora and fauna, critical habitats, and an extensive system of interconnected and highly productive vernal pools and wetlands. Therefore, we believe The Preserve must be *uniquely* conserved and managed. We continue to believe DEEP's plan to pursue active timbering and manage the entirety of The Preserve as a working forest, will not protect its vast natural resources. Furthermore, during the 17 year campaign to "Preserve The Preserve" the public, donors, and organizations who worked incessantly to conserve and acquire the 1,000-acre forest, never heard, expected, or imagined that it would become a harvested, working forest.

We look forward to begin talks soon with the CMC and DEEP to determine a path forward, achieve meaningful compromises, and complete final management plans that all parties can accept.

Sincerely,

Ray Allen, Director OSPR

Conveyor of Preserve Ad-Hoc Committee

Date: March 21, 2022

To: First Selectman Carl Fortuna and the CMC Committee

From: Keith Coughlin, Ad-Hoc Committee Member and NEMBA CT Chapter Member

RE: Conservation Management Committee Hybrid Meeting on Wednesday, March 23, 2022 @ 11:00am

Dear Carl and Committee:

I am unable to attend the rescheduled meeting this Wednesday due to business air travel, however I wish to have my comments read and added to the record during the meeting on March 23rd.

My name is Keith Coughlin, an Old Saybrook resident since 2014, and a Connecticut resident for most of my life. 2022 is my second year serving the Town of Old Saybrook as an Ad-Hoc committee member. I am a New England Mountain Bike Association (NEMBA) CT chapter member/trail steward for 25 years. CT NEMBA members are avid Preserve users and stewards of the trails. They have donated funds to the Preserve and have offered their expertise to help plan, propose, and carry out a sustainable trail system – all on a 100% volunteer basis. Outside of NEMBA, I participate in volunteer work for the Old Saybrook Land Trust Non-Profit Organization maintaining the various local properties and clearing invasive species.

Specific to The Preserve, I spend an average of 10 hours a week mountain biking, hiking, and dog walking within its boundaries. In a volunteer capacity, I routinely clear downed trees and debris on marked trails. As a mountain biker I have learned the contours of the Preserve and know first-hand the locations of the wetlands, the sensitive ground covers, and the wildlife throughout. Bikers cover 10-15 miles of trails during a typical ride, we observe most of the open space in the Preserve 2-3 times per week during all 4 seasons.

In my opinion, and the shared opinion of others in CT NEMBA leadership; The Preserve is not well suited for timbering due to the high number of rock ridge outcroppings that create an equal number of low-lying wetlands, marshes, and vernal pools. Viewed from above, the Preserve is a series of splines whereby most of the high points are between 100-200 feet high. During a 90-minute bike ride the average ascent and descent is between 1,000-1,400 ft. The fire roads are wet for half the year and are the primary entry points to The Preserve. To access the timber stands on the ridges and plateaus, trucks must pass through the wetlands. The wetlands are the main source of life for all the residing amphibians (frogs, salamanders, turtles) and mammals (fisher cats, bobcats, coyotes) that feed on them. There is a wide assortment of birds that populate The Preserve including owls, herons, hawks, and many other migrating birds. Erosion is an issue on existing trails, many were poorly designed. These trails would degrade further and immediately from timber trucks plowing through and dragging heavy timber out. Timbering would anger both the Preserve edge residents as well as the daily hikers, trail runners, bikers, and dog walkers that rely on these trails for their recreation and escape from daily stress.

I strongly believe that a Public Town Meeting is necessary to ensure that all neighborhoods surrounding the Preserve and the residents that frequent it for recreational use can be made fully aware of "The Plan" for the open space they fought so hard to keep open. The Town Meeting should be scheduled late enough if on a weekday (or on a Saturday) so that a fair representation of the public can be heard. A Protected and Stewarded Preserve is good for Old Saybrook – good for the welfare of its citizens and good for our local businesses that benefit from the many people that come to visit this natural coastal treasure.

Thank you for considering my comments.

Sincerely,



Keith Coughlin, 6 Crowley Drive, Old Saybrook, CT 06475



TOWN OF OLD SAYBROOK
Economic Development Commission

David Prendergast, Chair
Carol Conklin, Vice Chair
Sandra Roberts, Secretary/Treasurer

302 Main Street • Old Saybrook, Connecticut 06475
Telephone (860) 395-3139 • FAX (860) 395-3125

Judy Ganswindt
Nick Prevost
Elizabeth Swenson
Kacie Costello (Alternate)
Susan Quish (Alternate)

March 19, 2022

Conservation Management Committee
Town of Old Saybrook
302 Main Street
Old Saybrook, CT 06475

RE: The Preserve GEI Management Plan

Dear First Selectman Carl Fortuna:
CT DEEP Representative Will Hochholzer:
Parks and Recreation Director Ray Allen:

The Town of Old Saybrook Economic Development Commission (EDC) is writing to request that the Town of Old Saybrook hold a public hearing to discuss the GEI Management Plan for the Preserve in advance of any acceptance of the Plan.

The Preserve, as we know, is a unique coastal forest with over 900 acres in the Town of Old Saybrook; an adjoining 70 acres located in the Town of Essex; and 4 acres located in the Town of Westbrook; providing both a very valuable partnership among the adjoining towns and a wide range of recreational opportunities for our communities and visitors to the area.

The EDC supported the acquisition of the Preserve because of its value to our coastal wildlife and to our town and also as economic development incentive that would encourage people to visit Old Saybrook; to hike; and to enjoy our local shops and restaurants. And people are hiking in the Preserve on a regular basis in all seasons of the year, and our restaurants and shops are benefiting.

The Town voted overwhelmingly in 2012 to support bonding of \$3,500,000 toward the purchase of the Preserve. The vote was over 2,800 in favor; some 200 opposed. In addition, private donors and foundations contributed to the purchase of the Preserve ultimately providing 60% of the funding. There are a large number of stakeholders.

Among the issues needing further conversation are the forest management for timbering especially since creating a working forest was never a part of the acquisition campaign. While recognizing the need to manage trees and harvest some trees, there is concern about protecting the unique flora and fauna of the Preserve that does not lend itself to the type of working forest that is currently under discussion.

Further, because of the size of the Preserve and the fact that it is shared across three towns with hikers, bikers, and equestrians entering the Preserve from many different locations, and because the Preserve is in an area where there are surrounding neighborhoods, we want to further discuss the ways deer populations can be controlled and avoid hunting especially since it is not currently allowed in any of the three towns involved with the Preserve.

The EDC, in a unanimous vote, requests a formal presentation of the GEI Management Plan at a public hearing prior to acceptance of the plan and held on an evening when most citizens are available in order to discuss the issues identified above and any other issues related to the Preserve that our citizens would like to raise.

Cordially,

David Prendergast
Chairman, Economic Development Commission



Dear Carl Fortuna and the Conservation Management Committee,

We are writing on behalf of the Old Saybrook Land Trust.

As you may know, the Land Trust played an important part during the many years that it took to acquire The Preserve. We helped with the acquisition of the adjoining town parks of Great Cedars West and East and, we are an adjoining landowner.

OSLT is extremely concerned with the State's plan to open all of the accessible areas of the Preserve to logging, hunting, and trapping.

Members of the OSLT board attended the last Ad-Hoc zoom meeting of Feb. 24 and we are very disappointed in the apparent lack of a sense of compromise from CT DEEP.

We would like the following issues to be considered:

1. The creation of at least 50% of the Preserve to be set aside as an intact, undisturbed forest habitat that would eventually become an Old Forest Management area. Among our members are long time birders, members of CT Audubon, members of the CT Ornithological association and we understand the value of forest management and the creation of more open zones. These zones would increase habitats for a wide variety of birds and mammal species. However, there is also a critical need for large tracts of undisturbed mature forests that certain species of birds such as vireos, warblers, tanagers, and thrushes, to name just a few, require for successful breeding.
2. We are also concerned that logging may potentially be allowed near the more than 40 vernal pools that are in the Preserve. These pools are critically important to the variety of amphibians that can be found there and was one of the main arguments against the development of the Preserve from the very beginning. We know that the State plans on restricting logging to those months when the ground is frozen. This "frozen" time period in recent years is getting shorter and shorter. Some recent years along our shoreline it has become almost non-existent. Logging will lead to siltation and the possible removal of the canopy which shades these pools. Also, as noted from previous logging there, invasive plants will be the first plants to become established. The State's plan for "treatment" of invasives also includes the use of chemical means and we must ask, what will keep these chemicals from eventually draining into these pools and the head waters located in the Preserve?
3. Finally, it must be pointed out that unlike most of the State Forests located in more isolated sections of the state, the Preserve is more "park like" as it used by many residents of both Old Saybrook and the surrounding towns. As such, we disagree with

the state's plan on opening it up to all hunting and trapping. At best we would want a limited bow hunting season and with no trapping due to all the public use.

At no point in the acquisition campaign were we ever informed that the Preserve would become a working forest. 60% of the funding came from the town of Old Saybrook, donors, and private foundations and we request that some compromises be considered and that the final proposed draft management plan go before a public hearing.

Thank you.

Respectfully yours,
John Ogren, Anna Termine co-presidents, OSLT
on behalf of the OSLT board members

Michael W. Klemens, LLC
Ecological Land-use Planning
100 Main Street-Box C
Chester, CT 06412
March 23rd 2022

Executive Summary

At the request of The Preserve Ad Hoc Committee and Robin Blum of the CT-DEEP/NDDDB, I have reviewed the proposed forestry management plan for The Preserve State Forest. After reviewing the data from my multi-year field studies at The Preserve, and subsequent data presented in Klemens, et al (2021), my professional opinion is that the proposed forestry plan could have a greater impact on the natural resources of The Preserve than the scaled-down development plan of Riversound Development LLC that was denied. That plan conserved 76% of the amphibian bio-productivity of the site, by leaving large areas of The Preserve free of development and disturbance within 750 feet of several large meta-populations of wood frog, spotted salamanders, and marbled salamanders. These meta-populations occurred in well-defined clusters of vernal pools and drive the rich amphibian biodiversity of the entire site. Despite conserving the bulk of the bio-productivity of The Preserve's vernal pools, the Town of Old Saybrook rejected the proposed development based in part upon my testimony (on behalf of Riversound) that there would be impacts to the water quality of non-conserved pools by the elimination of wood frogs. This was a landmark court case (2010: River Sound Development LLC vs Inland Wetlands [Old Saybrook]) as it established in case law the ecological link between water quality and the presence of wood frogs.

The forestry plan is just that—a plan to turn this unique natural area into a working forest. There is scant consideration given to the ecological integrity of the site, and DEEP is employing inappropriate forestry BMPs that will be reasonably likely to cause unreasonable harm to the site and to the public trust in natural resources that DEEP is entrusted with protecting. While there are detailed peer-reviewed forestry BMPs for conserving vernal pool resources available, DEEP is relying on an unattributed in-house publication that has forest harvest as its prime objective. Conservation of fragile habitats and the species that inhabit them are given scant attention in this forestry plan. Review of the recorded testimony of DEEP staff responding to questions of The Preserve Ad Hoc Committee meeting (February 24, 2022) was instructive. Overly-simplified statements were made: (1) forestry is not development and is therefore relatively benign as it pertains to vernal pools; (2) much-needed early successional habitat will be a beneficial byproduct of the proposed forestry plan; and (3) past small scale logging had no impact on biodiversity. The consultants preparing the forestry plan cherry-picked citations to support the desired forestry outcome, neglecting many peer-reviewed publications that would support a thoughtful, science-based approach to forest harvest, mindful of the very specific fragile nature of the core portions of The Preserve.

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to this species' extensive, landscape-scale movements through multiple wetlands and upland areas over each year of their lives. As their lives span half a century or more, their survival is incompatible with the fragmented habitats of increasingly suburbanized Connecticut. Spotted turtles occur at multiple locations within The Preserve and would be vulnerable to being crushed as they move from wetland to wetland through the forest or when they aestivate in late summer under leaf litter.

During my multi-year study of The Preserve, I noted very low densities of box turtles. This is puzzling when compared to other nearby areas within the lower Connecticut River Valley. As this species lives up to a century, populations are vulnerable to the loss of individual adults. The paucity of box turtles encountered at The Preserve is in part the result of past and present land-use activities, which crush these terrestrial turtles during brush and forestry activities. On a return visit to The Preserve several years after my studies, I found a freshly crushed female box turtle on the Eversource ROW following brush clearing. Klemens et al (2021) devote an entire chapter (7:225-239) to Conserving Long-lived Reptiles with Delayed Sexual Maturity and Low Fecundity. The Preserve provides a large tract of unfragmented habitat that supports these two long-lived, low fecundity turtle species. These data refute in part statements made by DEEP and the forestry plan (p. 18) that past land use practices at The Preserve were benign, having no effect on the biodiversity of the site.

Vernal Pools and Forestry: Stands or Salamanders?

The large numbers of vernal pools that occur on The Preserve are the result of a convergence of factors including steep ridge and valley topography and an intact forested landscape. The Preserve is part of a much larger block of forest habitat, as stated on page 14 of the forestry plan, it's "part of a relatively intact forest block of more than 6,000 acres." As such it is a prime candidate to become part of a PHCA (Primary Herpetological Conservation Area). Klemens et al (2021:215) recognize that the future of the State's amphibians and reptiles will depend on the conservation of large blocks of habitat that are conjoined with minimal intrusion of roads and human development. Areas that contain robust populations of rarer amphibians and reptiles are especially appropriate for designation as a PHCA. Apart from those species previously discussed (wood frogs, spotted salamanders, and marbled salamanders), The Preserve contains robust populations of black racers, black rat snakes, and worm snakes, as well as dusky and four-toed salamanders. Black racers and dusky salamanders have disappeared over the last decades from many areas of Connecticut. Examination of the Wildlife Urban Interface map in Klemens et al (2021:248) illustrates how little un-fragmented habitat still remains in the State and how The Preserve fits into a regional mosaic of intact forest.

My studies (2003-2005) identified 38 vernal pools on The Preserve, and William Moorhead found some additional "potential pools" in his multi-year (2017-2020) vegetation and habitat study. In my 2005 report the richness of the vernal pool ecosystem was attributed to many of the cryptic vernal pools lying within wetland systems with weak to moderate flow. These pools lie in various headwaters which allow successful reproduction (through metamorphosis) in pools that contain very shallow water, the depth at times measured in inches. In fact, most wetland scientists would not recognize many of these wetlands/watercourses as vernal pools. However based on biological data, the seepage fed shallow wetlands oozing across the landscape, coalescing from small vernal pools into ever-larger vernal pools is exactly what makes The Preserve both unique and very fragile. Many of these vernal pools contained populations of dusky salamanders (a headwaters seepage salamander) occurring sympatrically with larval vernal pool amphibian species. These long-hydroperiod vernal pools support the largest concentrations of marbled salamanders in the State.

approach to habitat management. Invasive plants often serve as surrogates for native plants. Wholesale elimination of invasive plants can have disastrous consequences for many terrestrial reptiles. Box turtles seek shelter without distinction between a native bayberry or invasive multi-flora rose bush. Klemens et al (2021:208-209) discuss a phased approach to the removal of invasive species so as not to disrupt the ecology and survivorship of reptiles that utilize them. The forestry plan (p. 55) illustrates Japanese stilt grass (invasive=bad) growing along a trail on The Preserve. While this species may offend those who are attempting to take our natural world backward to some form of yet-to-be-defined pre-Columbian purity, Japanese stilt grass provides extremely productive habitat for smaller frogs, and the occasional young box turtle.

Conclusion

The DEEP forestry plan presented is biased toward a desired outcome, forestry operations that will, overtime, encompass most of The Preserve. Certain areas of The Preserve may be compatible with certain types of forestry, but in my professional opinion the core vernal pool areas of The Preserve should be a designated, permanently conserved natural area where ecological processes continue unimpeded by the impacts of forestry operations. Rather than planning a logging regimen that will ultimately affect most portions of this forest, I suggest that these aforementioned core natural areas be identified first, mapped with an adequate buffer around them, and then the forestry plan be developed that respects these no-touch natural areas. Fortunately the data to conduct such a data-driven conservation design are available from my studies which clocked over 600 hours in the field (2002-2005) augmented by subsequent fine-grained natural community and botanical studies conducted by William Moorhead (2017-2020). Moorhead reached a similar conclusion about the importance of leaving large portions of the forest core of The Preserve intact as a "forest preserve." Unfortunately, what has occurred is that a forestry plan was developed *a priori*, with the flawed underlying assumption that the entire site should be rotationally logged, and that all species and habitats could and would adapt to and be sustained by this rotational logging regimen.

The bibliography of the forestry plan omits many important studies and publications that would make the case that I have made to you. Pages upon pages of "stand analyses" are devoid of meaningful consideration of the ecological matrix that undergirds the "1000-acre forest." I use that term to remind everyone that this was the rallying cry that mobilized the citizens of the State, from local neighbors, town governments, conservation NGOs and then Attorney General Blumenthal, to seek public and private funds to acquire this property for the stewardship of all its unique and fragile ecological features for all the citizens of Connecticut.

If I can provide you with any additional information, please do not hesitate to contact me.

Sincerely,



Michael W. Klemens, PhD

Cc: The Preserve Ad Hoc Committee (Ray Allen, Chair)
DEEP-NDDDB: Robin Blum