



VIA ELECTRONIC DELIVERY

July 31, 2024

Connecticut DEEP – Forestry Division
79 Elm Street
Hartford, CT 06106

Dear Gerald Milne & Colleagues,

On behalf of Audubon Connecticut and New York (Audubon), a regional program of the National Audubon Society, thank you for considering these comments on the Forest Management Plan for the Lakeville Reservoir Block of Centennial Watershed State Forest (the Plan). Audubon protects birds and the places they need, today and tomorrow, throughout the Americas using science, advocacy, education, and on-the-ground conservation. Audubon's state and regional programs, nature centers, chapters and partners have an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite communities in conservation action.

In addition to supporting the forest economy and providing multiple ecosystem services, including recreation, water quality, carbon sequestration and storage, and flood protection, Audubon recognizes that the forest covered by the Plan provides significant habitat to birds and other wildlife. Northwest Connecticut is a predominantly forested landscape encompassing several priority areas for forest birds, Important Bird Areas, and a multitude of large, forested landholdings, of which this state forest block is one. In the region, Audubon manages the Sharon Audubon Center and Miles Wildlife Sanctuary and maintains relationships with partner organizations to encourage and facilitate landscape-level forest management and planning. The opportunity to comment on this Plan, and to support the management outlined within it, is in line with these goals.

Considering landscape context is a critical component of Audubon's approach to forest bird habitat management. This approach integrates landscape ecology and multiple use management to promote habitat diversity, while enhancing overall forest health and resiliency. Within that broader landscape context, it is good to see this block identified as part of an important intact core forest that spans several adjacent landholdings (F.1, Landscape Context). Many mature forest birds and Audubon priority species, such as Wood Thrush and Scarlet Tanager, require core forest for the best breeding success. Considered within that broader forested landscape, the management prescribed in the Plan will improve habitat quality within this core forest for these and other forest birds, many of which migrate from Central and South America to breed here. Audubon supports the management proposed in this Plan by DEEP, AWC, and TNC, which will further habitat goals alongside water quality and other goals for this forest block.

Forest Health & Structure

The current conditions across much of the forest are not conducive to providing high quality habitat or adequate watershed management (this is stated in the Plan and was observed during a site visit by Audubon staff in July). As stated in the Plan, the current lack of complex vertical structure across the forest lessens the health of the watershed and negatively impacts water quality. These same structural conditions also result in lower-quality habitat for forest nesting birds that require native understory and midstory structure for nesting and foraging. The lack of structural complexity, combined with high deer pressure and invasive plant presence, is unlikely to resolve itself without active management. Left unmanaged, the current forest will continue to be composed of a single overstory layer with either invasive species or a lack of understory below.

Managing for drinking water quality (the stated primary goal for this property) is extremely compatible with management to improve forest bird habitat. The management outlined in the Plan will maintain healthy watershed function and improve wildlife habitat by managing the invasive species, controlling the deer population, and encouraging a more diverse forest structure to develop. Thus, DEEP, AWC, and TNC will encourage regeneration of native understory and midstory layers, creating a more complex forest structure that provides a diverse suite of forest birds with places to nest, forage, seek cover, and raise their young.

As mentioned in the Plan, there are extensive areas of Japanese barberry in the understory, some of which have already been treated. In addition to the reasons already stated in the Plan for treating the barberry, it is a problematic species for birds and other wildlife. Although it does produce berries that birds can eat, they are not as nutritious as native fruits. Perhaps more critically, barberry and other invasive plants do not support the full diversity of native insects that birds rely on for nutrition during the breeding and migration seasons. Furthermore, the associated loss of leaf litter from increased earthworm presence in barberry stands (as outlined in the Plan) is a detriment to birds such as Wood Thrush that require a thick litter layer to support insects for foraging.

Carbon & Climate Resiliency

Audubon supports the carbon sequestration and storage objectives detailed in the Plan. Our forests are natural climate solutions and the ecologically focused management in this Plan can help sequester and store more carbon while also achieving multiple co-benefits, keeping our forests as forests. Further, we support increasing climate resiliency in our forests through thoughtful planning and management strategies. These actions will strengthen forest climate strongholds that will better endure climate change stressors and support the wildlife that currently use or will use these forests due to shifting ranges. Implementing the active management outlined in the Plan will move the forest block more towards a multi-aged landscape, contributing both to climate resiliency and robust habitat.

Silviculture & Priority Bird Species

Audubon supports the management outlined in the Plan for its potential to improve habitat for a suite of forest nesting bird species. The selection system outlined for Stands 6, 7, and 9 will benefit Cerulean Warbler, along with a whole host of other forest birds that use similar habitat. Cerulean Warbler is a priority

species for northwest Connecticut (and as mentioned in the plan, a species of State Special Concern). Cerulean Warblers are neotropical migrants that spend the summer breeding season in mature hardwood forests, preferring those with a large component of oak (particularly white oak), hickory, and sugar maple. They preferentially nest in large canopy trees next to canopy gaps where there is abundant understory growth for them to forage. Selection systems like what is proposed in the Plan are commonly prescribed to improve habitat for them, as they encourage both understory regeneration and canopy tree growth.

The management planned for other stands in the block will also benefit forest birds. The Plan mentions the mature softwoods in Stands 8 and 9 that provide habitat for softwood-loving bird species like Pine, Black-throated Blue, and Black-throated Green Warblers. Implementing even-aged management in Stand 8, as is prescribed, will hopefully encourage some softwood regeneration to ensure that this habitat feature continues to be a component of this predominantly hardwood forest. It will also create new patches of young forest, providing future habitat for young forest birds like the Chestnut-sided Warbler (mentioned in the Plan) as the existing sapling-aged gaps continue to mature.

The Plan makes note of the fact that Golden-winged Warbler is listed as a State Endangered species with potential for habitat in the northwest corner of Connecticut where this forest block is located. Given the size and accessibility limitations of the block, it is understandable that management to create habitat for Golden-winged Warbler was not feasible to include. However, Audubon supports the potential to create such habitat collaboratively on a landscape scale, if the neighboring landowners named in the Plan were interested in doing so.

Conclusion

Thank you for considering these comments and for your commitment to ensuring that management at the Lakeville Reservoir Block of Centennial Watershed State Forest is ecologically comprehensive and achieves multiple goals, such as wildlife habitat, forest health, biodiversity, and resiliency, while also providing ecosystem services such as carbon sequestration, flood control, and water filtration. We are happy to collaborate with DEEP, AWC, and TNC to address habitat management needs for birds within this unit, and have included a link here to our publication [Managing Forests for Trees and Birds in Connecticut](#). If you have any questions about these comments, please do not hesitate to contact me at rosa.goldman@audubon.org.

Sincerely,



Rosa Goldman
Forest Program Senior Associate
Audubon Connecticut and New York