



January 16, 2024

Dan Jackson  
35 Hartford Turnpike  
Dayville CT, 06041

Dear Mr. Dan Jackson,

I understand that the Town of Killingly Inland Wetlands and Watercourses Commission has requested additional information regarding the state-listed species that are potentially present on your property at 3 Hartford Pike in Killingly. The Connecticut Department of Energy and Environmental Protection (CT DEEP) has identified a *Natural Diversity Database Area* along a section of the Quinebaug River and land adjacent to it that overlaps your property. CT DEEP has provided a Determination Letter listing species potentially present and management recommendations for them. The species are:

- Frosted elfin (*Callophrys irus*)** – State threatened
- Pink star moth (*Derrima stellata*)** – State special concern
- Eastern box turtle (*Terrapene carolina carolina*)** – State special concern
- Wood turtle (*Glyptemys insculpta*)** – State special concern

As part of your forest management plan that I approved, and again as part of your application for the Environmental Quality Incentives Program (EQIP), our staff reviewed the Determination Letter and concluded the following.

The property at 3 Hartford Pike does not provide suitable habitat for frosted elfin or pink star moth and the forest management you will be undertaking will not create such habitat. The Determination Letter for frosted elfin states that the host plant it depends on requires at least 6 hours of direct sunlight per day. Habitat for pink star moth is characterized as very sandy, open, often disturbed sites, especially sand fields, sandplains, barrens, and quarries. The heavily forested conditions at 3 Hartford Pike do not currently provide suitable habitat for frosted elfin or pink star moth. The forest management that is planned involves treatment of invasive species in the forest understory and a crop tree release of 10, or slightly more, trees per acre. This will not create sufficient light conditions or soil disturbance to provide habitat for those species.

Suitable habitat for eastern box turtle and wood turtle is present at 3 Hartford Pike. To remain in compliance with the EQIP program you are obligated to follow the management recommendations for both species in the Determination Letter. It is strongly advised that you only conduct mechanized forest operations during the dormant season for eastern box turtle and wood turtle: November 1 – April 1. To protect box turtles who might be hibernating in the soil follow best management practices to avoid soil compaction and limit the total area impacted by mechanized vehicles to less than 25%.

If you do conduct mechanized forest operations during the active season then there are recommendations in the Determination Letter for educating work crews about the appearance and habits of the turtles, daily scouting for turtles, and what to do if a turtle is found that must be followed. It should also be noted that the EQIP program does not allow tree cutting between April 15 and August 15 to protect northern long-eared bats and nesting migratory birds, which limits the period of the active season where forest operations may occur.

Natural Resources Conservation Service  
344 Merrow Road, Suite A  
Tolland, CT 06084

For box turtle there are also microhabitat conditions to maintain and general recommendations regardless of when the harvest occurs.

#### Microhabitat Conditions

- If wood is chipped, chips shall be removed from the site or left in piles in an area disturbed by other harvest activities, preferably at the landing.
- Where feasible, leave two snags/acre to provide a source of large woody debris for future overwintering sites and cooler microhabitat refuges.
- Where feasible, avoid disturbing fallen logs or snags that will serve as future sources of woody debris.
- Avoid disturbing pits from tipped root mounds which can serve as overwintering locations.

General recommendations for forest management that benefit this species include:

- Discontinue logging roads after operation are complete so they do not provide new access points to sensitive stream habitat or provide increased vehicle or recreational traffic in the general area.
- On sites where options exist, favor site preparation techniques that minimize soil disturbance and compaction and overall minimize impacts to the forest floor.
- Give special consideration to unique habitat features within the forest such as ephemeral wetlands, springs, seepages, and rock outcrops.
- Maintain a patchwork of harvest practices in this area to meet the different life stages of this species. Including both mature forest and forest openings. If the only available sun-exposed ground is along roadsides, road mortality may occur as females seek nesting grounds and individuals bask.

I hope this information meets the needs of the Commission and that you continue to move forward under the EQIP program. If any further clarification is needed, please contact me.

Sincerely,

Forester  
Natural Resources Conservation Service  
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