



January 6, 2021

Dear Members of the Governor's Council on Climate Change:

As the New England States Senior Coordinator for the Congressional Sportsmen's Foundation (CSF), I am submitting comments on the Governor's Council on Climate Change's (GC3) Draft GC3 Phase 1 Report Near-Term Actions document through the online survey, but I am also submitting this letter to express our sheer dismay with the process by which the GC3 is collecting public input. Throughout the past several months, CSF has worked alongside partner-conservation organizations to weigh-in on the materials that lead to the creation of your draft report. During this process, however, we have been utterly disappointed at the lack of responsiveness and the tactics implemented to avoid feedback from the public. CSF is not alone in this discontent, and my hope is that this letter will push the GC3 to improve the public input process in a manner that meets expectations for a professional, government chartered body charged with making decisions that will impact private lands, public lands, public trust resources, and businesses in the state.

On October 21, CSF signed a letter with eight (8) other conservation organizations that was submitted to the Forests Subgroup with regard to the Subgroup's draft report. At no point since the letter was submitted have any of the participating organizations received any acknowledgement that their comments were received, which is more than disheartening – it is a complete lack of transparency. Even at the lowest levels of government, providing follow-up after the receipt of comments is a business-norm, so it is unimaginable why a working group that is preparing materials for the Governor's eyes would find it acceptable not to, at a minimum, acknowledge receipt, or incorporate feedback from the public.

Possibly the greatest disappointment we have with this whole process is the egregious manner in which the comment period was opened. To have the notice filed on December 24 (Christmas Eve) and extended over the holidays – the slowest work week in America – while completely disregarding the hardships that this would place on individuals and organizations trying to review the document and prepare comment is completely disheartening. Opening the window during the holiday season has been received by many individuals – if not most – as an attempt to use the cover of night to avoid comment from the public. Whether or not this was intentional is beyond us, but several parties within the conservation industry took note of this poor timing and are left with sheer discontent in the GC3.

With regard to the substance of the Draft GC3 Phase 1 Report Near Term Actions document, although the document does not explicitly recommend policies that prevent commercial timber harvests, the report continues to make recommendations that run counter to practices that are critical to improve wildlife habitat and forest health, such as active forest management – which employs the use of silvicultural methods and forest management practices, such as prescribed burning and timber harvesting to create desired habitat conditions and forest stand composition and structure. Specifically, when the GC3

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considers how to achieve goals 28(a)-(b), it is worth noting that the state's forests are primarily maturing forests, with 78% of the trees being over 60 years old. Connecticut's Forest Action Plan has identified this forest aging and progression to nearly 80% of stands in the sawtimber size class (over 11" diameter at breast height) as representing "potential detrimental effects for forest product sustainability, for protection against catastrophic weather or insect and disease outbreaks, and for wildlife species that depend on early successional habitats." [Hochholzer](#) 2015, p. 13. The continued emphasis on "permanent protection" instead of "conservation" illustrates the lack of incorporation of our feedback into the plan. Please reference our October letter as well as our January 6 comments submitted online for more information about the importance of management flexibility for supporting forest health and wildlife.

Regarding both the substance of the draft report and the process going forward, I hope that my comments prove to be useful.

Sincerely,

A handwritten signature in black ink that reads "Joseph D. Mullin". The signature is written in a cursive, flowing style.

Joseph Mullin
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Enclosed: Group Comments G3C-Forest Report Final

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