



Connecticut Fund
for the Environment

Save the Sound®

December 2, 2016

Mr. Colin Goegel
Supervising Engineer
Connecticut Airport Authority
334 Ella Grasso Turnpike, Suite 160
Windsor Locks, CT 06096

RE: Draft Environmental Assessment/Environmental Impact Evaluation for Off-Airport Tree Obstruction Removal at the Groton-New London Airport

Dear Mr. Goegel,

The Connecticut Fund for the Environment (“CFE”) and its bi-state program Save the Sound respectfully submit the following comments on the Draft Environmental Assessment (“EA”) and Environment Impact Evaluation (“EIE”) for selected tree removal both within and around the Bluff Point State Park and Coastal Reserve. CFE is a state and region-wide nonprofit organization dedicated to environmental protection and advocacy that represents approximately 5,000 members in both Connecticut and New York. Many CFE members make frequent use of Bluff Point State Park and adjacent waters of the Poquonock River and Long Island Sound. Upon review of the Draft EA/EIE, CFE believes that there are ways in which the Connecticut Airport Authority (“CAA”) has inadequately addressed the likely environmental impacts and necessary mitigation of CAA’s preferred alternative of modified airspace obstruction removal.

CFE recognizes that aviation safety and unobstructed airspace are necessary and reasonable objectives which require CAA to periodically remove obstructive trees in various locations throughout the state. Bluff Point State Park and Coastal reserve, however, is an unequalled and irreplaceable natural resource that provides critical ecosystem services on a regional scale. The current Draft EA/EIE does not take into sufficient account the implications of tree removal within the context of this resource or appropriate mitigation measures that would lessen or counterbalance disruptions to the local ecosystem. Accordingly, the final version of the EA/EIE must undertake a much more substantive analysis of the preferred alternative’s potential to impair the natural resources of the state and fully explore mitigation measures to ameliorate such effects to the greatest extent possible.

I. The Draft EA/EIE Fails to Consider Habitat Implications of Tree Removal

First, the current Draft EA/EIE contains an incomplete analysis of the likely habitat impacts on the numerous avian, mammal, and marine species that are present in the local ecosystem. As the largest remaining undeveloped parcel of coastal woodland on the Connecticut shoreline, Bluff Point State Park serves a critical role for its constituent species on both a local

and regional scale.¹ For example, Bluff Point is located within a major migratory bird flyway, with at least 222 distinct species of migratory birds having been observed within the Park and Coastal Reserve.² The National Oceanic and Atmospheric Administration has designated the waters around Bushy Point as essential habitat for 11 different fish species.³ Indeed, the immediate environs of Bluff Point serve as habitat for several state and federal endangered or otherwise threatened species, including the Piping Plover (*Charadrius melodus*), Roseate Tern (*Sterna dougallii*), American Oystercatcher (*Haematopus palliatus*), Common Tern (*Sterna hirundo*)⁴, Long-eared Bat (*Myotis septentrionalis*)⁵, and the unique New England Cottontail Rabbit (*Sylvilagus transitionalis*)⁶.

The Draft EA/EIE fails to adequately address the impacts that tree removal may have upon affected species within the Park and Coastal Reserve. Greater consideration of such implications is imperative, given the endangered and threatened status of several species and the overall protections afforded to avian species generally by the Migratory Bird Treaty Act and its attendant regulations.⁷ The Draft EA/EIE currently recognizes these impacts in only a cursory manner, without providing detailed, substantive information on how such impacts will be proactively mitigated. For example, when noting that the selective thinning of forest beneath the Runway 33 approach will likely destroy habitat for the Wood Thrush (*Hylocichla mustelina*) and Worm-eating Warbler (*Helmitheros vermivorus*)—which have been the subject of renewed state habitat conservation efforts⁸—the Draft EA/EIE summarily concludes that such species will not be impacted due to the overall size of available habitat elsewhere in the area.⁹ Relying on the remainder of the woodland in the Park and Coastal Reserve to absorb those wildlife populations that tree removal adversely affects is insufficient. Indeed, it is the uninterrupted 800 acres of woodland at Bluff Point that makes the area such a critical habitat resource. This is particularly so in regard to the proposed tree removal on Bushy Point, which by virtue of its geography, is less accessible than other portions of the Park and therefore all the more critical as undisturbed habitat.

¹ Long Island Sound Study, “Stewardship Areas: Bluff Point,” available at

<http://longislandsoundstudy.net/2012/10/bluff-point/> (last visited Nov. 23, 2016).

² Dave Rosgen and Gene Billings, *Finding Birds in Connecticut: A Habitat-based Guide to 450 Sites*, 485 (Rainbow Press 1996); see also “Bluff Point State Park Overview,” EBIRD, (last updated Oct. 31, 2016) available at <http://ebird.org/ebird/hotspot/L109240> (last visited Nov. 30, 2016).

³ National Ocean and Atmospheric Administration, “Essential Fish Habitat Mapper,” NATIONAL MARINE FISHERIES SERVICE HABITAT CONSERVATION, available at <http://www.habitat.noaa.gov/protection/efh/efhmapper/> (last visited Nov. 30, 2016).

⁴ See “Bluff Point State Park Overview,” *supra* note 2.

⁵ United States Fish & Wildlife Service, “New London County, Connecticut,” INFORMATION FOR PLANNING AND CONSERVATION, available at <https://ecos.fws.gov/ipac/project/S2TW75BKVVDDPNFB3TYKUYZIMI/resources> (last visited Nov. 28, 2016).

⁶ Department of Energy & Environmental Protection, “New England Cottontail Restoration Focus Areas in CT,” (last updated Oct. 5, 2016), available at http://www.ct.gov/deep/cwp/view.asp?a=2723&q=514596&deepNav_GID=1655 (last visited Nov. 29, 2016).

⁷ 16 U.S.C. §§ 703–709; 50 C.F.R. § 10.13.

⁸ Gregory B. Hladky, “State Identifies Five Key Areas Critical To Protecting Threatened Bird Species,” *Hartford Courant* (July 11, 2016), available at <http://www.courant.com/news/connecticut/hc-ct-key-bird-areas-20160711-story.html> (last visited Nov. 28, 2016).

⁹ Connecticut Airport Authority, “Draft Environmental Assessment (EA) & Environmental Impact Evaluation (EIE) for Obstruction Removal Groton-New London Airport (GON),” 5-8 (Nov. 2016).

Rather, CAA should craft its tree-removal plans—in coordination with the Department of Energy and Environmental Protection (“DEEP”) and other stakeholder organizations—to implement removal in a manner that provides a net benefit to the local ecosystem by capitalizing upon ways in which the thinning of healthy forest can create additional habitat. For example, if managed properly and prudently, the open spaces created by the preferred alternative could potentially provide increased habitat for particular species such as the imperiled New England Cottontail,¹⁰ a longtime candidate for listing under the federal Endangered Species Act,¹¹ the American Woodcock (*Scolopax minor*),¹² and the Indigo Bunting (*Passerina cyanea*).¹³ Although the Draft EA/EIE recognizes the potential for such habitat benefits, it includes no specifics beyond that.¹⁴ As the removal of trees within the Park and Coastal Reserve will require coordination with biologists, certified foresters, and wildlife management experts as well as ultimate approval of DEEP¹⁵, CAA should begin planning how to carefully and proactively manage its proposed tree removal at the EA/EIE stage in order to ensure that habitat benefits become a reality and adverse impacts are avoided. Indeed, given the widespread interest in habitat creation for vulnerable species, CAA would likely be able to partner with interested groups in such an endeavor.¹⁶ Likewise, in examining how the preferred alternative can be used as a vehicle for net ecosystem benefits, CAA must identify and address negative impacts that may arise due to tree removal. For example, clearing trees may result in the propagation of destructive invasive species already present within the Park and Coastal Reserve such as Asiatic Bittersweet (*Celastrus orbiculatus*) and Japanese Barberry (*Berberis thunbergii*), the latter of which some researchers suggest may be correlated with an increased prevalence the Deer Tick (*Ixodes scapularis*), which serves as a vector for Lyme Disease.¹⁷ Similarly, the removal of trees could foster increased growth of browse and the forest understory, leading to an increase in the local White-tailed Deer (*Odocoileus virginianus*) population well beyond the ecosystem’s carrying capacity, a problem Bluff Point has faced in the past and which required intervention by DEEP.¹⁸ With adequate foresight and preparation, the tree removal that the preferred alternative entails can be carried out in such a way that will minimize harmful impacts to the sensitive Bluff Point ecosystem and provide select habitat benefits. As the Draft EA/EIE does not substantively consider such strategies, CFE urges that CAA take these options under serious consideration moving forward.

¹⁰ “Habitat Ins and Outs,” WORKING TOGETHER FOR THE NEW ENGLAND COTTONTAIL, available at <http://newenglandcottontail.org/habitat/habitat-ins-outs> (last visited Nov. 29, 2016).

¹¹ “Secretary Jewell Announces New England Cottontail to be Excluded from Endangered Species List,” U.S. DEPARTMENT OF THE INTERIOR (Sept. 11, 2015) available at <https://www.doi.gov/pressreleases/secretary-jewell-announces-new-england-cottontail-be-excluded-endangered-species-list> (last visited Nov. 30, 2016).

¹² “American Woodcock,” DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION (last updated Dec. 1999) available at http://www.ct.gov/deep/cwp/view.asp?a=2723&q=326104&depNav_GID=1655 (last visited Dec. 1, 2016).

¹³ “Indigo Bunting,” CORNELL LAB OF ORNITHOLOGY (last updated 2015) available at https://www.allaboutbirds.org/guide/Indigo_Bunting/lifehistory#at_habitat (last visited Dec. 1, 2016).

¹⁴ Connecticut Airport Authority, *supra* note 9, at 5-8.

¹⁵ *Id.* At 3-6.

¹⁶ *See generally* “Partners,” WORKING TOGETHER FOR THE NEW ENGLAND COTTONTAIL, available at <http://newenglandcottontail.org/partners> (last visited Nov. 29, 2016).

¹⁷ Carl Zimmer, “The Rise of the Tick,” *Outside Magazine* (Apr. 30, 2013), available at <http://www.outsideonline.com/1915071/rise-tick?page=all> (last visited Nov. 29, 2016).

¹⁸ “The Biology of Bluff Point State Park, Groton,” DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION (last updated 2015) available at http://www.ct.gov/deep/cwp/view.asp?a=2716&q=417062&deepNav_GID=1650 (last visited Nov. 23, 2016).

II. The Draft EA/EIE Contains No Analysis Regarding Climate Change

Second, CFE is deeply concerned that the Draft EA/EIE contains zero analysis or consideration of the climate change implications of removing numerous trees in a vulnerable coastal ecosystem. Forested areas provide critical ecosystem services by functioning as carbon sinks that naturally absorb excess carbon dioxide from the atmosphere.¹⁹ Due to the large size of the coastal forest present within the Park and Coastal Reserve, Bluff Point's woodlands are doubtless a critical sequestration resource. Given the current state of the Draft EA/EIE, it is uncertain as to exactly how many individual trees CAA is proposing to remove and therefore difficult to analyze the cumulative climatological impacts that such removal will have at a both a state and regional level. Likewise, the Draft EA/EIE is silent on whether the removal of airspace obstructions will lead to an increase in air traffic utilizing the Groton-New London Airport. If so, CAA must analyze the effects of increased greenhouse gas emissions from an increase in air traffic. Although anthropogenic climate change is a problem of global significance, its localized effects are especially pertinent in this case. An ICLEI and DEEP report to the Town of Groton on local climate change preparation and resiliency specifically identified both the Groton-New London Airport and Bluff Point State Park and Coastal Reserve as areas that stand to be adversely affected by sea level rise and the increased risk of localized flooding during weather events.²⁰ Thus, despite the state and municipal recognition of local climate vulnerability, the Draft EA/EIE does not factor this element into any of its environmental impact analyses.

III. The Draft EA/EIE Fails to Consider the Unique Status of Bluff Point

Finally, as the Draft EA/EIE explicitly recognizes, Bluff Point serves as an important undeveloped coastal barrier.²¹ The Park and Coastal Reserve contain a number of rare and unique habitats, including coastal woodlands, saltmarshes, sand beaches, coastal grasslands, and intertidal marshes.²² Many of the aforementioned at-risk species rely on the presence of these habitats at one point or another in their respective life cycles. Underlying the Connecticut General Assembly's decision in 1975 to permanently protect Bluff Point was its recognition that it was worth "preserving its native ecological associations, unique faunal and floral characteristics, geological features and scenic qualities in a condition of undisturbed integrity."²³ In regard to the preferred alternative specifically, the unique coastal woodland ecosystem within

¹⁹ United States Forest Service, "Carbon Sequestration," VALUING ECOSYSTEM SERVICES, available at <http://www.fs.fed.us/ecosystemservices/carbon.shtml> (last visited Nov. 23, 2016).

²⁰ Missy Stults and Jennifer Pagach, "Preparing for Climate Change in Groton, Connecticut: A Model Process for Communities in the Northeast; A Report to the Town of Groton and Communities throughout New England from ICLEI-Local Governments for Sustainability and Connecticut Department of Environmental Protection," 7 (Apr. 2011) available at http://www.groton-ct.gov/depts/plandev/docs/Final%20Report_Groton%20Coastal%20Climate%20Change%20ProjectJP.pdf (last visited Nov. 30, 2016).

²¹ Connecticut Airport Authority, *supra* note 9, at 5-3.

²² *See generally* "The Geology of Bluff Point State Park, Groton," DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION (last updated 2015) available at http://www.ct.gov/deep/cwp/view.asp?a=2716&q=398432&deepNav_GID=1650 (last visited Nov. 30, 2016).

²³ "Bluff Point State Park, Groton – Overview," DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION (last updated Aug. 18, 2016) available at http://www.ct.gov/deep/cwp/view.asp?a=2716&q=325178&deepNav_GID=1650 (last visited Nov. 29, 2016).

the Park and Coastal Reserve is particularly precious given the large size of the forest parcel and that many of the trees therein are 90 to 100 years of age.²⁴

The Draft EA/EIE, however, treats the Park and Coastal Reserve as any other parcel of private property CAA must obtain access to and not as the sensitive ecosystem and unparalleled biological resource that it is in reality. The property owner at issue is DEEP—charged with the duty of safeguarding the property and its resources—and by extension, the people of the State of Connecticut, all of whom have a public right in the use of the Park and Coastal Reserve. Any action that CAA takes at Bluff Point broadly affects the public and if CAA is not already in communication with DEEP concerning its proposal, it is imperative that it initiate such communication immediately. Given the ecological importance of the woodlands located at Bluff Point, CAA should consider additional safeguards and methods to ameliorate the impacts of the preferred alternative. In the process of identifying which trees need to be removed, CAA should, in consultation with DEEP, identify whether certain trees can simply be pruned to remove airspace obstructions rather than felled entirely. Likewise, CAA should consider replanting policies in order to prevent a net loss of trees within the Park and Coastal Reserve. For example, a one-for-one replanting program would replace those trees removed below the runway approaches with new tree plantings in other portions of the Park and Coastal Reserve that will not grow into airspace in the future. Additionally, trees could be planted in throughout the park in strategic ways that would provide overall ecological benefits, such as increased flood resiliency and soil stability in vulnerable areas or preemptive protection against encroachment by deleterious invasive species. As such action will require CAA to extensively coordinate its efforts with DEEP, these mitigation measures should be considered as soon as possible and not later, subsequent to the actual tree removal.

Respectfully submitted,

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²⁴ See Long Island Sound Study, *supra* note 1.