
From: Lori Brown, Executive Director, Connecticut League of Conservation Voters

On behalf of CTLCV, thank you for the opportunity to comment on opportunities to strengthen HB 6610. The concept is to establish Connecticut as a “No Net Loss of Forest” state.

A lot of work has been done in recent years to produce solid recommendations on ways to best protect our state’s forests.


The interdisciplinary Science and Technology working group of the GC3 specifically highlighted the importance of old and old-growth forests for combined climate and biodiversity benefits.

We ask that legislators use this opportunity to design a bill that would create substantial and lasting protections with a true “No Net Loss” approach that goes beyond reforestation to:

- Keep forests as forests
- Protect healthy, intact forests
- Offset planned or permitted forest losses
- Provide financial incentives for stewardship, forest retention, and forest resiliency
- Protect urban forests, build more parks, and plant more trees

Removing a forest and planting trees is a serious loss, but is counted as a “no net loss”. This is a problem due to the statutory definition of a forest (i.e. trees as a crop and not a forest as a complex ecosystem). When we clear a forest there is a loss of carbon, biodiversity, and ecological integrity that cannot be planted. This is why preventing “net loss” needs to start with a LESS LOSS/NO LOSS approach.

To this end, CTLCV recommends that the Environment Committee consider adding provisions of HB 5592 regarding forest protections to HB 6610.
No loss of natural “mature and old-growth forest” should mean not losing it on state land, or by replacing it with other public land of that quality (i.e. buy private land to replace it).

In sum, we need to **first do no harm**.

Forests are complex ecosystems that desperately need more interdisciplinary collaboration, data collection and independent oversight in the areas of ecology, climate science, public health, water, and green infrastructure. Any community advisory group needs to be connected with interdisciplinary expertise and free from conflicts.

CTLCV urges the Environment Committee to support and strengthen HB 6610 with the provisions outlined above. Please see additional background information contained in CTLCV’s [Briefing Paper](#) on OLD GROWTH FORESTS in Connecticut, or use the QR code:

![QR Code](#)

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**CONSIDER ADDING PROVISIONS OF HB 5592 TO HB 6610**

The concept of HB 5592 is to identify, plan for, and manage and protect, old-growth and mature forests, and to provide a mechanism for ongoing reporting to and informing the General Assembly on the status of old-growth forests in the state:

1. Add mature and old growth forests as priority areas for acquisition by the Natural Area Preserves System and to expressly bring the definition, identification, and management of mature and old-growth forests under the purview of the Natural Heritage, Open Space and Watershed Land Acquisition Review Board,

2. require that by February 15, 2024, such board shall submit a report to the General Assembly detailing the board’s plan to define, identify, and complete an inventory of old-growth and mature forests, and to analyze any threats to mature and old-growth forests in the state, and

3. require that annually thereafter the board shall submit a written report to the General Assembly on or before February 15, 2024, detailing the board’s efforts and progress on such plan and including recommendations for the development of policies for conservation strategies for the management and the maximization of protection of mature and old-growth forests and associated rare natural resources.