



BACKCOUNTRY HUNTERS AND ANGLERS

New England Chapter

May 30, 2018

Attn: Brett Hillman
 USDA Forest Service
 2538 Depot Street
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 bretthillman@fs.fed.us

BHA VT State Leadership Team

Dave Furman, Jericho, Co-Chair
 Matthew Breton, Charleston, Co-Chair
 Tovar Cerulli, Marshfield
 Ethan Dreissigacker, Craftsbury Common
 Kyle Lapointe, Townshend
 Eric Nuse, Johnson
 Joshua White, Bethel

Re: Early Successional Habitat Creation Project, GMNF

Mr. Hillman,

We are writing to you on behalf of the New England members of Backcountry Hunters & Anglers (BHA). BHA is one of the fastest growing conservation organizations in the country. Our members are hunters and anglers who support policies that promote backcountry experiences, healthy fish and wildlife habitat, and sound stewardship of public lands and waters.

The Green Mountain National Forest is part of one of the largest and most important areas of generally remote publicly owned and accessible land in Vermont. We consider it a high priority area with regard to our values of solitude, adventure, self-reliance, conservation, and access to high-quality fair chase hunting and fishing experiences. With those values in mind, our comments are below.

1. The plan proposes to create 45-75 miles of roads in 15 years, of which 30 miles would become permanent. The creation of 30 miles of permanent roads will ecologically impact and fragment the National Forest. We oppose these permanent roads and urge that they not be created or be removed when not in use.
2. There is no mention of riparian buffers. The plan should recognize the importance and fragility of riparian zones. All riparian zones should have woody buffers to protect stream banks and regulate water temperatures. Riparian buffers at a minimum should be 30-50' from the stream edge. Larger streams should have larger woody buffers.
3. We propose that federally designated wilderness areas receive a 300' buffer so that the clear-cuts do not run right to the edge of the wilderness area. A timber operation directly next to the boundary of a wilderness area would negatively affect the character of that wilderness area.
4. No mention was made of providing buffers around vernal pools. All vernal pools should have no cut zones around their perimeter. At a minimum, vernal pools should have 150' buffers.

5. In general, cutting the edge of a wetland does not contribute to “improving the wetland habitat.” Wetlands should be allowed to function naturally, unless there is a specific silvicultural treatment designed to benefit a species or group of species. (For example, rusty blackbirds are a regional species of concern. They require young single cohort softwood pole stands along wetlands. Creating small softwood clear-cuts that abut a wetland would potentially benefit rusty blackbirds.) Unless cutting achieves a specific, clearly articulated goal, we propose a 150’ buffer around wetland habitat.

We look forward to staying apprised of developments following the public review and comment period, and to seeing some of these changes in the plan.

Thank you for your continued work on behalf of our public lands.

Sincerely,



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