



# BACKCOUNTRY HUNTERS AND ANGLERS

## New England Chapter

April 24, 2019

**Attn:** David Francomb, c/o Jay Strand  
Manchester Ranger District  
2538 Depot Street  
Manchester Center, VT 05255  
jay.strand@usda.gov

**BHA VT State Leadership Team**

Dave Furman, Jericho, Co-Chair  
Matthew Breton, Charleston, Co-Chair  
Brittany Lewis, Danville  
Ethan Dreissigacker, Craftsbury Common  
Kyle Lapointe, Townshend  
Eric Nuse, Johnson  
Joshua Morse, Burlington

**Re:** Somerset Integrated Resource Project, GMNF

Mr. Francomb,

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 remove/downgrade a number of roads and block travel, which we support. We hope that there is a plan to monitor the non-system woods roads/trails for unauthorized use following their closure.
2. We are concerned with the proposed thinning, trimming and removal for backcountry ski access- this activity has the potential to focus use, which has some benefit, but this focused use will potentially cause those users who value solitude to travel further away, magnifying the impact. We propose that people who want to have a true backcountry ski experience go do so, without the need for a curated experience. The thinning, trimming and removal of vegetation to augment activities that are backcountry in nature seems counterintuitive. For this area, we do support the recreation component of the plan that proposes a parking area and trailhead, with kiosks that educate people about conservation, wildlife and remote habitat protection.
3. If additional glade clearing does happen, we strongly support a mechanism to ensure that high volume, concentrated use from backcountry skiing and associated year-round trail maintenance does not affect connectivity or integrity of habitat features such as wintering

areas, important food sources, or travel corridors for both game and non-game species, and that further illicit glade clearing does not happen outside the scope of any approved trails.

4. We oppose the expansion of terra-trails within GMNF in conjunction with this project; however, we recognize that there is a sizeable offset of trails that will be decommissioned and unauthorized user trails that will be blocked, which we support. Despite our opposition, we applaud the location of these trails in areas where major recreation is currently taking place, rather than pushing them further into backcountry areas.
5. A major concern is the development of multiple connected trails systems without a larger, landscape scale focus and direction, such that remote country is degraded in a piecemeal fashion. The 2.1 miles of hiking trail that is proposed, done to connect to proposed mountain bike trails, is suspicious in intent and ripe for misuse, which, if not planned for, will accelerate degradation of the habitat.

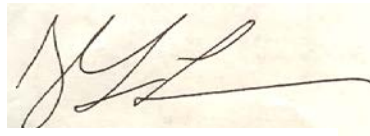
We look forward to staying apprised of developments following the public review and comment period, and to seeing some of these changes in the plan.

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

Sincerely,



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