



# BACKCOUNTRY HUNTERS AND ANGLERS

**Attn:**

June 28, 2021

Christopher Mattrick  
Rochester/Middlebury District Ranger  
Green Mountain National Forest  
99 Ranger Road  
Rochester, VT 05767

**Re: 2021 Maple Tapping Special Use Permits**

Mr. Mattrick,

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 a diverse group of 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 (GMNF) is one of the largest and most important areas of remote and accessible public land in Vermont. We consider it among the highest-priority areas in Vermont with regard to our values of solitude, adventure, self-reliance, conservation, and access to high-quality fair chase hunting and fishing experiences. We recognize and strongly support that our National Forest system is managed for multiple uses, including the harvest of special forest products where it is appropriate to do so and where it does not interfere with the long-term sustainability, quality and access of other user-groups. However, larger-scale commercial maple tapping has different characteristics than other types of forest product extraction and the significant increase in proposed maple tapping permit acreage on GMNF raises several concerns that BHA believes must be addressed.

The proposed 2021 maple tapping permits represent an additional 328 acres, on top of the existing 250 or so permitted acres, which is over a 120% increase. Although the acreage is relatively small within the GMNF, the overall growth of tapped acreage in VT is on a scale to have significant impacts to dispersed forest users, and we believe likely also to wildlife movement, from increasingly larger networks of maple sap tubing. This topic, as it relates to public land, is an increasingly significant concern for BHA.

1. As stated in the GMNF Management Plan, wildlife and wildlife management is an integral focus of the Remote Wildlife Habitat Management Area (RWHMA) purpose: "The major emphasis of the Remote Wildlife Habitat MA is to provide a mix of differentiated forest habitats, from early succession to old forests, for the primary benefit of diverse wildlife species, including reclusive wildlife species." While the Plan states "Recreation uses are de-emphasized to minimize continuing disturbance to

wildlife”, regulated hunting itself is a management activity conducted in part to ensure the health of both habitat and wildlife populations, and therefore this activity cannot be entirely separated from the purpose of the RWHMA designation. We believe regulated hunting, as a management activity creating relatively infrequent and brief disturbances, is consistent with the Management Plan. We believe activities that may hinder or preclude wildlife from utilizing this habitat for a longer duration are inconsistent with the plan, and that the reference to recreation refers mainly to recreational infrastructure such as trails and campsites, which would lead to a year-round increase in the volume and frequency of disturbance to the Management Area.

2. Because these SUPs and the SUP amendment happen in Remote Wildlife Habitat Management Areas and the “major emphasis” of the RWHMA is “for the primary benefit of diverse wildlife species, including reclusive wildlife species” BHA believes the proposed SUP’s are inconsistent with the National Forest Management Plan for the RWHMA because larger-scale commercial maple tapping can reasonably be expected to threaten the wildlife-based purpose of, and diminish the remote character of, this management area, which is in conflict with the emphasis of the RWHMA in the Forest Plan. The presence of tubing and the human activity associated with this process will present a continuing disturbance to wildlife well-above the level of other uses deemed appropriate.
3. If these and future Special Use Permits are granted, either in the current proposed RWHMA or in another Management Area more suitable for this intensive activity, we propose adjustments to the permit specifications detailed as bullet points below to maintain habitat integrity for wildlife and to ensure dispersed users maintain quality access to permitted areas.

In personal conversations with maple researchers in Vermont, there is no scientific information one way or another showing impact to wildlife movement, or to other forest users, from modern commercial maple tapping. However, there is ample scientific evidence showing that regular human activity such as pedestrian, bike or ATV use does affect wildlife movement and its ability to access and utilize habitat.<sup>1</sup> We also know the spider web of tubing in a commercial tapping area is frustrating to navigate for humans and diminishes dispersed forest users such as hunter’s and skier’s ability and desire to access the area. It is reasonable to expect then, that tubing networks and an associated increase in activity, like any obstacle, will also form some degree of a barrier to movement for wildlife, simply by changing the physical path of least resistance through the area. In addition, unlike the disturbance from timber management which exists in one location for only a short time, the tapping activities and infrastructure will exist across the area for up to 10 years, or longer if permits are renewed. Because of this, modern commercial tapping activity seems grossly inconsistent with the primary purpose of the RWHMA, to maintain habitat, including for reclusive species. Other management guidelines for the RWHMA are focused on minimizing long-term and frequent visitation in order to maintain

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<sup>1</sup>Wisdom, et al. Elk responses to trail-based recreation on public forests, Forest Ecology and Management, Volume 411, 2018, Pages 223-233, ISSN 0378-1127, <https://doi.org/10.1016/j.foreco.2018.01.032>.

the desired undisturbed, remote conditions necessary for wildlife to utilize the area which is also in conflict with the proposed commercial tapping activity. As such, we believe modern commercial maple tapping should be considered inconsistent with the National Forest Management Plan within the RWHMA, and new commercial tapping activities should be restricted to Management Areas of National Forest designated for intensive and permanent commercial use.

Based on the above concerns, after reviewing the 2021 Proposed Action for Maple Tapping SUPs, we have several additional thoughts we would like to see addressed in Maple Tapping Special Use Permits, if they are issued, in order to minimize impact to wildlife, habitat value and other forest users:

- Plastic tubing across the permit areas likely influences wildlife's ability to access and utilize habitat, and definitely affects dispersed forest users such as hunters. Outside the allowed working time-period, feeder lines should be required to be removed to allow both wildlife and dispersed users unhindered access and utilization of the permit area.
- Because tubing is likely an impediment to unhindered wildlife movement, and regular human traffic is shown to cause flight in animals at considerable distance, no maple tapping SUPs should be authorized in areas containing, or adjacent to, identified wintering areas, regardless of Management Area designation.
- We believe best practice should avoid "boundary-to-boundary" permit areas between tracts of non-permitted national forest, as is proposed in Project Map A, in order to avoid any impediment to wildlife movement limiting access across the permitted area to reach habitat features elsewhere on the National Forest, or on adjacent parcels.
- It is scientifically-documented that human traffic such as pedestrian, bike and ATV use affects wildlife and its ability to access and utilize habitat.<sup>2</sup> If new motorized access is required and allowed, which we strongly oppose, the additional use should be restricted to the period during which tapping is allowed, and gated during the off-season to ensure compliance with closure periods to avoid impacts caused by traffic affecting both the relatively remote character and the habitat-value of the National Forest, and for continued enjoyment and utilization by dispersed forest users.
- Permits should mandate that new ATV roads or trails created as part of a SUP must be reclaimed and all infrastructure removed when the permit ends.
- BHA supports the stipulations around dates work activities are allowed (January 15 - April 30).
- If feeder lines are allowed to remain in place outside the allowed work activity period, BHA supports a requirement for line heights that allows unhindered movement for both humans and large wildlife including moose.

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<sup>2</sup> Snetsinger, S.D. and K. White. 2009. Recreation and Trail Impacts on Wildlife Species of Interest in Mount Spokane State Park. Pacific Biodiversity Institute, Winthrop, Washington. 60 p.

- We support strict limits on timber management related to the maple-tapping SUP to prevent monoculture and maintain natural forest understory for the purposes of natural regeneration and maintenance of habitat value.
- BHA supports permit restrictions around use of and seasonal removal of vacuum pumps/generators and storage tanks, and enforcement of this removal. We support a public review process of both SUP renewals as well as new permits, to ensure the publics' visibility and ability to provide input is maintained in the future.

Looking forward, with the very fast growth in the maple industry<sup>3</sup> and increasing area under maple tapping SUP's, we anticipate a continued increase in demand for maple tapping permits over the next years. While the impact from maple tapping may not have been as significant in the past, as the scale of this industry increases, the effect on wildlife and other user groups is likely to become much greater. BHA would like to see the creation of a "master plan" with a public input process for maple tapping in the GMNF so that all parties could have common visibility of its impact on the forest and on other user groups in the big picture, and decide based on this what the eventual footprint of commercial maple tapping operations on the entire National Forest should look like. This would provide helpful transparency and predictability for all parties involved.

While BHA strongly supports VT's tradition of maple sugaring and many of our members are among those who take part, larger industrial-scale operations measured in the thousands of taps, as currently practiced, may not be the best fit for our National Forest lands which must be shared with wildlife and other user groups. Loud generators and vacuum pumps, thousands of feet of plastic tubing strung through the woods, and off-highway vehicle use do not strike us as particularly sustainable or favorable conditions for sharing this public space, especially in the more remote Management Area classifications of the GMNF. We believe that in order to be a true compatible use, the increase in disturbance and the potential year-round presence of tubing networks necessitates that any commercial maple permit should be limited to the more intensively-used management areas of the GMNF. Further research needs to be conducted and best-practices need to be developed that can be shown to allow unhindered wildlife and pedestrian movement through tapped areas, with a focus on maintaining the general natural character and quality of experience across the area in question. Without adopting strategies such as this to maintain the integrity of our natural areas we run the risk of degrading or even de-facto losing access to some of our most valuable publicly-accessible areas for many years to come. If conditions in an area are such that the quality of experience is no longer there, it doesn't matter that a hunter or other recreator still has legal access to go, this still represents a loss of access. BHA's goal is and always has been to maintain and enhance everyone's ability to access backcountry experiences and healthy fish and wildlife habitat, both now and in the future—we believe this is what sound stewardship of public lands and waters means.

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<sup>3</sup> "Vermont maple syrup production up 7 percent" Vermont Business Magazine, 6/12/2019, <https://vermontbiz.com/news/2019/june/12/vermont-maple-syrup-production-7-percent>

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

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

Sincerely,

**Backcountry Hunters and Anglers, VT State Leadership Team**

Dave Furman, Jericho, Co-Chair

Matthew Breton, Charleston, Co-Chair

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