



BACKCOUNTRY HUNTERS AND ANGLERS

New England Chapter

March 12, 2023

Attn: Attn: CHRISTOPHER MATTRICK
USDA Forest Service
99 Ranger Road,
Rochester, VT 05767

Re: Telephone Gap Integrated Resource Project, GMNF

Mr. Mattrick,

We are writing to you on behalf of the New England members of Backcountry Hunters & Anglers (BHA). BHA 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. We support the proposed forest management work if it stays in line with VT Conservation Design
2. We continue to be concerned about expanding trail development.
 - a. Our first concern is that there is proposed trail expansion despite mention in this document (p.12 of the proposed action – detailed version) that, “the challenges involved in maintaining existing trails and facilities to desired standards could lead to increases in health and safety risks and potential damage to resources such as soil, water, and fisheries.” This alone should give conservationists pause about new trail construction. When much of the rest of the work planned in this IRP is about maintaining and restoring conditions of ecological health, expanding something that is already a challenge to maintain seems counterproductive.
 - b. We are concerned about trail expansion impact on wildlife. While the physical structures of hiking, biking, and ski trails may not have prominent ecological effects, our concern is that the high density human presence associated with the ongoing use of these trails can profoundly affect both wildlife and the backcountry characteristics of the landscape. (see Wildlife Recreation- Understanding and Managing the Effects of Trail Use on Wildlife, By Meredith Naughton, UVM, 2021) (link in footnote)¹.

¹ https://www.uvm.edu/femc/attachments/project/999/annualMeeting/2021/presentations/Meredith_Naughton.pdf

- c. We support decommissioning of poorly designed/located trails.
 - d. We also broadly support accessible trails that serve a variety of mobility types, if they are located close to existing infrastructure.
3. With regard to roads, we advocate for no permanent expansion. We strongly support culvert work that assists in flood resiliency and aquatic organism passage. We also support gates and access areas that allow for dispersed recreation on GMNF land.
 4. We continue to be concerned about the addition of more huts on the GMNF. There should be areas where the touch of human existence is exceedingly light, perhaps, slightly paraphrasing the Wilderness Act, where man himself is a visitor, whose presence does not remain. There are many cabins available to interested parties in nearby towns, where infrastructure and its maintenance have little-to-no impact on wild experiences.
 5. Maple tapping on the GMNF, and its associated infrastructure, are a concern to us. Plastic tubing strung through the woods, punctuated by the sound of a vacuum pump running all spring, are counter to what an experience on USFS land should be about.

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,

Backcountry Hunters and Anglers, VT State Leadership Team

Dave Furman, Jericho, Co-Chair

Matthew Breton, Charleston, Co-Chair

Ethan Dreissigacker, Craftsbury Common

Kyle Lapointe, Townshend

Eric Nuse, Johnson

Joshua Hardt, Hubbardton

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