

Data Submitted (UTC 11): 2/13/2023 5:00:00 AM

First name: Andrew

Last name: MacArthur

Organization: Trout Unlimited Southwestern Vermont

Title: Chapter President

Comments: Trout Unlimited is a national organization with 387 chapters across the United States. These comments are submitted by the Southwestern Vermont Chapter of Trout Unlimited which serves Bennington and Rutland Counties.

TU believes in bringing all parties to the table to find proactive solutions that meet the challenges facing coldwater fisheries. We work to protect important habitat, reconnect degraded waterways and restore trout populations. We also seek to educate the public on these issues and to that end operate 90 Trout in the Classroom projects throughout Vermont in conjunction with Vermont Fish and Wildlife.

The proposed Project encompasses hundreds of miles of small upland streams that are the home of Vermont's only native stream-dwelling trout, the Brook Trout, which is Vermont's State fish. (Actually, they are a char.) While no formal survey has been undertaken, it is probably safe to assume that all these upland headwaters contain populations of Brook Trout.

According to Vermont Fish and Wildlife, water temperature is the most important factor in Brook Trout habitat with temperatures between 55 F. and 60 F. considered to be ideal. It therefore comes as no surprise that the greatest threats to the Brook Trout are climate change, the removal of trees that provide the shade critical to maintaining cold water temperatures and construction activities that result in run-off that both warms and fouls the water with sediment.

The Proposed Project will involve extensive logging, the construction of roads, both permanent and temporary, as well as new trail construction. TU takes no position on any of those activities. However, we do request that the Plan be amended to directly address the need to protect cold water fisheries and to require that all of the activities prescribed by the Plan be done in a way that protects our cold-water fisheries and the unique habitat they provide. Significantly, the Plan for the GMNF states as one of its objectives: [ldquo]Maintain or enhance fish populations through habitat protection, enhancement and restoration [hellip].[rdquo]

We acknowledge that all the proposed logging activities will be done in accordance with Vermont's Acceptable Management Practices for Maintaining Water Quality on Logging Jobs in Vermont which gives us assurances that the logging will be done in a way that does not adversely affect our cold water resources.

However, it appears that there are not comparable standards that govern the road and trail building contemplated by the Project. Indeed, while there are road and trail construction standards that set forth recommended road and trail building techniques and standards, they do not specify environmental standards that would protect waterways similar to the logging standards. We would therefore ask that the Plan be amended to address how the roads and trails will be constructed and maintained in a manner that will not adversely affect adjacent waterways.

Also, there was no discussion of the importance of adding woody debris to upland streams in order to improve fish habitat. This was a major component of the recently issued Somerset Integrated Resource Project and it would be helpful to understand why this initiative was not made a part of this Project.

Lastly, we appreciate and support the plan to remove the abandoned dam in Chittenden and the replacement of traditional culverts with bridges or bottomless culverts that will permit the passage of fish and other organisms.