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Comments: The Vermont Fish and Wildlife Department (Department) has completed a review of the Green Mountain National Forest's (GMNF) Northern Escarpment Ecological Restoration and Fire Resilience Project and offers the following comments in accordance with your public comment period ending February 11, 2026. The Department appreciates being included as a collaborator in the development of this project and commends GMNF for its thorough and inclusive approach to public scoping. The Department also appreciates the detailed information that was presented by GMNF resource specialists at the January 21, 2026, public meeting as well as the comprehensive nature of the supporting documents made available on your website. Recognizing the potential ecological benefits it will garner, the Department is very supportive of the overall goals and objectives of this project. Although a few areas of potential concern have been raised by the Department regarding the project, it is important to note that GMNF has actively engaged our staff over the past several months to address these concerns. The following comments, therefore, are offered for the purpose of memorializing those areas of concern upon which our organizations have previously collaborated and to highlight our recommendations for resolving them.

* GMNF outlines seven different design features for the protection of federal and state listed threatened and endangered bat species known to occur in and around the project area. The Department reiterates its support for GMNF's adherence to these protections and again stresses the importance of fully incorporating the guidelines outlined in the USDA Forest Service's Bat Conservation Strategy for Forest Service-Managed Lands of the Eastern United States, Eastern Region (R9) Southern Region (R8) (<https://usfs-public.app.box.com/s/b6m889xo3jylmbp90u53htv9477xd270>). Specifically, pages 46 and 55–57 of this document discuss different conservation measures designed to address the direct take of bats that may be in torpor in roosts in the spring through careful planning, cutting trees outside the summer occupancy period, and burning when temperatures are above 40 degrees.

* With respect to the protection of sensitive plant species in the treatment areas, GMNF identifies one project specific design feature that states - "Botany program personnel will provide exclusion area polygons and seasonality of vulnerability for fire-intolerant RFSS plant populations. Those known populations of fire-intolerant RFSS plants will be buffered and excluded from prescribed fire as called for in the provided seasonality guidance." While the Department supports this approach for protecting sensitive plant species, it recommends that GMNF botany program personnel continue to collaborate with the Department's Botanist, including time afield together in the project area, to help refine which species should be subject to protection and how their populations are mapped and buffered. For the sake of furthering our collective understanding of the effects of the proposed management practices on rare plants, the Department also recommends that GMNF implement a pre and post burn monitoring plan for priority rare plant populations within the project area.

* GMNF lists two design features for the protection of state-designated significant natural communities and old forests. Specifically, these protections include consultation with the Department's Natural Community Ecologist prior to implementation where Vermont state-designated old forests occur within or adjacent to management activities, and the mapping and avoidance of state-significant hemlock forests with any burn treatments. Again, the Department appreciates this approach and reiterates its support for further consultation with its Natural Community Ecologist in the mapping of these landscape features and the implementation of appropriate protective measures.