



February 11, 2026

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

Re: Northern Escarpment Ecological Restoration and Fire Resilience Project

Dear District Ranger Mattrick,

On behalf of the Congressional Sportsmen's Foundation, I write to express our support for the Northern Escarpment Ecological Restoration and Fire Resilience (NEERFR) Project. The NEERFR Project will improve habitat diversity for wildlife, promote the regeneration of oaks and other fire-adapted species, improve forest health and resilience to wildfires, and enhance opportunities for Vermont's sportsmen and women.

Founded in 1989, the Congressional Sportsmen's Foundation (CSF) is the informed authority across outdoor issues and serves as the primary conduit for influencing public policy. Working with the Congressional Sportsmen's Caucus (CSC), the Governors Sportsmen's Caucus (GSC), and the National Assembly of Sportsmen's Caucuses (NASC), CSF gives a voice to hunters, anglers, recreational shooters, and trappers on Capitol Hill and throughout state capitols advocating on vital outdoor issues that are the backbone of our nation's conservation legacy.

The proposed actions for the NEERFR Project, including (1) the prescribed fire treatments to reduce fuels, reduce abundance of more common mesic northern hardwood and softwood species, and to support fire-adapted flora, (2) the non-commercial hand-felling of common tree species to increase understory sunlight and promote early azalea, (3) the mechanical fuel and herbicide treatments to reduce competition and fuel loading, and (4) the small patch fencing of early azalea, oaks, and rare plants to support regeneration by limiting deer browse, and (5) the treatments to increase the resiliency of hemlocks to nonnative invasive insects, and (6) tree planting of oak species, pitch pines, and red pines, will move the 2,770-acre project area towards the desired future conditions for the Green Mountain Escarpment, Moosalamoo Recreation and Education Area, and

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the Bryant Mountain Hollow Ecological Special Area Management Areas described in the 2006 Green Mountain National Forest Land and Resource Management Plan.¹

Specifically, the proposed actions support the Green Mountain Escarpment Management Area's desired future condition to provide a "diverse array of natural communities and stages of vegetation development" and to support rare species that require limited shade.² The proposed actions also support the Moosalamoo Recreation and Education Area's desired future condition to "provide a unique opportunity to educate" the public "through demonstration of sustainable forest management" and "wildlife habitat enhancement."³ Additionally, the proposed actions further the Bryant Mountain Hollow Ecological Special Area Management Area's desired condition to exemplify "mesic and enriched oak-northern hardwood forest with an abundance of rare or uncommon plants."⁴

In the Green Mountain Escarpment Management Area, fire use is permitted under its Fire Management Guidelines, and the Timber Management Guidelines state that, "prescribed fire should be used for regenerating oak and pine dominated natural communities, and when maintaining or establishing fire-dependent species."⁵ In the Moosalamoo Recreation and Education Area, prescribed fire is permitted under its Fire Management Guideline.⁶ In the Bryant Mountain Hollow Ecological Special Area Management Area, fire is also permitted under its Fire Management Guideline.⁷ Additionally, the prescribed fire treatments further the Vermont Forest Action Plan's desired future condition to conserve biological diversity across all landscapes through Strategy 7 that encourages management activities to "restore landscapes; habitats; genetic diversity; rare, threatened, or endangered species; species of greatest conservation need; and other species at risk."⁸ Fire supports early azalea (*Rhododendron prinophyllum*), which is the host species for the azalea mining bee (*Andrena cornelli*), which is a listed Regional Forester Sensitive

¹ Green Mountain National Forest Land and Resource Management Plan. 2006. U.S. Forest Service. <https://usfs-public.app.box.com/s/whshlp7g13vut7lonulsb1dfvsiwnb>

² *Id.* at 86.

³ *Id.* at 100.

⁴ *Id.* at 94-95.

⁵ *Id.* at 87.

⁶ *Id.* at 102.

⁷ *Id.* at 96.

⁸ Vermont Forest Action Plan at 29. 2017. Vermont Agency of Natural Resources. Department of Forests, Parks, and Recreation. Division of Forests.

https://fpr.vermont.gov/sites/fpr/files/Forest_and_Forestry/Vermont_Forests/Library/2017_VT_ForestActionPlan.pdf

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Species and also identified as a High Priority Species of Greatest Conservation Need in the draft 2025 Vermont Wildlife Action.⁹

The Pests, Diseases, and Non-Native Invasive Species Guidelines for all three management areas allow the use of chemical controls for target pests.¹⁰ Moreover, the treatments to increase vigor and resistance of hemlocks to hemlock woolly adelgid, elongate hemlock scale, and spongy moth support the Vermont Forest Action Plan's desired future condition to maintain forest ecosystem health and ecological productivity through Strategy 18 to slow the spread of non-native invasive species that have an impact on forest ecosystems and Strategy 19 to identify examples of hemlock to be protected from non-native pests to implement strategies to combat infestations.¹¹

In addition to reducing fuel loads, the prescribed fire treatments will enhance wildlife habitat by increasing vegetative diversity, increasing the availability of forbs and grasses, improving cover, and creating diverse habitats across the management areas. Nongame and game species important to Vermont's sportsmen and women, including wild turkey, white-tailed deer, and black bear, among others, benefit from prescribed fire.

CSF represents the interests of Vermont's sportsmen and women, the primary funders of state-based conservation efforts and significant contributors to Vermont's economy, who depend on access to the Green Mountain National Forest to pursue their outdoor pastimes. Hunters in Vermont support 3,200 jobs, \$122 million in salaries and wages, \$27 million in state and local taxes, with a total economic effect of \$400 million.¹² As reported by the U.S. Fish and Wildlife Service for 2025, Vermont's sportsmen and women generated more than \$17.9 million for conservation funding, supporting the Vermont Department of Fish and Wildlife through the "user pays – public benefits" American System of Conservation Funding.¹³

Thank you for considering our comments, and we look forward to seeing the NEERFR Project implemented to support Vermont's sporting traditions that depend on healthy forests and productive habitats for wildlife.

⁹ Vermont Wildlife Action Plan. 2025. Vermont Fish and Wildlife Department.

[https://www.vtfishandwildlife.com/sites/fishandwildlife/files/documents/About%20Us/Budget%20and%20Planning/WAP2025/A.4%20Invertebrate%20SGCN%20Conservation%20Reports%20\(Draft%2012-2025\).pdf](https://www.vtfishandwildlife.com/sites/fishandwildlife/files/documents/About%20Us/Budget%20and%20Planning/WAP2025/A.4%20Invertebrate%20SGCN%20Conservation%20Reports%20(Draft%2012-2025).pdf)

¹⁰ Green Mountain National Forest Land and Resource Management Plan at 87, 96, and 101.

¹¹ Vermont Forest Action Plan at 44. 2017.

¹² "Economic Impacts of Hunting and Target Shooting – Technical Report." Southwick Associates, produced for the Sportsmen's Alliance Foundation. December 2021. <https://sportsmensalliance.org/wp-content/uploads/2022/02/2020-Economic-Impact-of-Hunting-and-Shooting-Technical-Report-V2.pdf>

¹³ Vermont: American System of Conservation Funding Fact Sheet. 2025. Congressional Sportsmen's Foundation. <https://congressionalsportsmen.org/reports/vermont-american-system-of-conservation-funding-fact-sheet/>

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Sincerely,



John Culclasure
Director, Forest Policy
Congressional Sportsmen's Foundation

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