

Hannah Phillips
State Lands Administration Program Manager
Vermont Agency of Natural Resources

RE: Comment on Vermont ANR Lands Management Planning Rule – 8/27/2024 Draft

Dear Hannah Phillips,

On behalf of the Ruffed Grouse Society and American Woodcock Society, I appreciate the opportunity to comment on the draft rule guiding the management planning process for Vermont’s state-owned lands. We commend the Vermont Agency of Natural Resources (ANR) for developing a comprehensive framework that supports responsible stewardship and integrates public input into the management of approximately 375,000 acres of state forests, parks, and wildlife management areas.

As an organization dedicated to the conservation of forest wildlife and sustainable forest management, we fully support the overall process outlined in the draft rule, including the development of Statewide Plans, Long Range Management Plans (LRMPs), and Annual Stewardship Plans (ASPs). The approach of balancing multiple uses—ranging from wildlife habitat enhancement to recreational opportunities—aligns well with our mission of promoting active, science-based forestry that benefits both wildlife and the public.

Support for Active Management and Science-Based Decision Making

We particularly endorse the emphasis on using the best available science in management planning, as highlighted in Section 4 of the draft rule. Active management, including habitat enhancement, forest health treatments, and sustainable timber harvesting, is essential for maintaining diverse and resilient ecosystems that support species such as the Ruffed grouse, American woodcock, Golden-winged warbler, Canada warbler, Olive-sided flycatcher, Wood thrush, and hundreds of other bird, wildlife and plant Species of Greatest Conservation Need listed in Vermont’s 2015 State Wildlife Action Plan. These species depend on habitat diversity, which is underrepresented in Vermont’s forested landscapes.

Importance of Public Engagement

We also applaud ANR’s commitment to public engagement as an integral part of the planning process. Public scoping, informational meetings, and opportunities for public comment ensure that management decisions reflect a broad range of stakeholder interests. This inclusive approach not only fosters a shared understanding of ANR’s stewardship goals but also strengthens public support for the active management of state lands.

Recommendations

While we strongly support the draft rule, we encourage ANR to ensure that management actions explicitly prioritize habitat diversity, align with Vermont’s Conservation Design framework, and incorporate adaptive management strategies that respond to changing ecological conditions and emerging scientific knowledge.

In closing, we thank ANR for its dedication to responsible land management and look forward to continued collaboration in promoting healthy, sustainable forests that benefit wildlife and the people of Vermont.

Sincerely,

Todd H. Waldron

Todd H. Waldron

Forest Conservation Director – Northeast U.S.

Ruffed Grouse Society & American Woodcock Society

toddw@ruffedgrousesociety.org