RESTORE: The North Woods

SUBMITTED ELECTRONICALLY TO:
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Comments on Silver Lake Hut Construction and Operation Permit Amendment

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

Dear Mr. Mattrick:

I am submitting comments on the proposed Silver Lake Hut Construction and Operation Permit Amendment project. These comments are submitted on behalf of RESTORE: The North Woods, a nonprofit organization with members in Vermont and across New England. These members are concerned with the protection of the Green Mountain National Forest and are frequent users of the forest for nature study, recreation, and spiritual renewal.

The Forest Service is responding to proposal from two private organizations — the Vermont Huts Association and Moosalamoo Association — to amend their Chittenden Brook Hut Special Use Permit to construct a new “hut” on Silver Lake. Once constructed, the proposed “hut” would be operated by the Vermont Huts Association.

The Forest Service contends that this project does not require an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA), but only requires a “Categorically Exclusion” that does not include any substantive environmental analysis.

RESTORE: The North Woods strongly opposes this project, including for the following reasons:

• **New project with new construction, not expansion of existing permit.** Silver Lake is a completely separate location and project from the location and project addressed by the Chittenden Brook Hut Special Use Permit. This project involves major construction of a new building in a new location. It is not legitimate to lump this new project with the existing Chittenden Brook project.
• **Incompatible with current protection and use.** The Silver Lake site proposed for construction of the new recreational rental cabin (euphemistically called a “hut”) is now remote, roadless and lightly used. Development is limited to a small, primitive campground. These are unique attributes that contrast with much of the region and they are valued by people seeking quiet recreation in a natural setting. The new “hut” would be a glaring intrusion that permanently degrades this remote natural landscape.

• **Environmental impacts from new construction.** The land on which the new recreational rental “hut” would be constructed is now roadless, natural, and remote — attributes that are increasingly rare in Vermont and New England. This new “hut” would permanently degrade these values. Construction would involve significant and unavoidable environmental impacts, including site clearing of native vegetation, noise and pollution from power tools, soil erosion and sediment runoff, and visual disruption. These impacts could harm wildlife such as the endangered Indiana bat, and erode the backcountry visitor experience.

• **Ongoing environmental impacts.** The operation of the new recreational rental “hut” would also result in impacts on the natural environment, which would be ongoing and unavoidable. These impacts would likely include pollution and climate disruption from fossil fuel heating, elevated water use and runoff, increased amounts of human-generated waste, and mechanized access for maintenance and other services.

• **Degradation of public enjoyment.** The construction and operation of this recreational rental “hut” would permanently degrade the public’s enjoyment of this unique tract of public land. The “hut” would be an obvious and prominent intrusion that would mar the scenery for hikers, boaters, and campers. Increased recreational traffic would change the now-remote and uncrowded character of the area. Artificial lights would degrade dark-sky values while “hut” users would add noise to the now-quiet ambience. The unspoiled character of the area would be seriously harmed.

• **Privatization of public land use.** The new recreational rental “hut” would be constructed, operated, and controlled by the private Vermont Huts Association. This organization would charge a fee to use the “hut” and its members would receive a discounted rate and priority use, limiting and potentially precluding use by the general public. This would discriminate against people who cannot afford or do not wish to become members of the Vermont Huts Association. What is now a publicly accessible recreation site would become a private facility operated for private benefit.

• **Cumulative effects.** The Forest Service proposes to circumvent NEPA analysis of the “hut” project through the use of a superficial Categorical Exclusion. Such a shortcut is allowed for actions “which have been determined not to have a significant individual or cumulative effect on the human environment.” There is no indication that the Forest Service has done the research, review, and analysis of this project necessary to make such a determination. In fact, there is reason to believe that the project would contribute to serious cumulative environmental effects. Along with the Silver Lake “hut” project, there are several other proposed projects in the district —
such as the Moosalamoo-Silver Lake Connector Trail, Silver Lake Recreation Site Improvements, and Falls of Lana Parking Lot Reconstruction — which have not been assessed. These projects could result in major cumulative effects and their total impacts must be carefully considered. The completion of a full Environmental Assessment is the only legitimate option for analysis of all of these projects.

**Conclusions**

I reiterate the opposition of RESTORE: The North Woods to the proposed Silver Lake Hut Construction and Operation Permit Amendment project. We recommend that the Forest Service abandon this ill-conceived plan.

The natural integrity of the Green Mountain National Forest is already being compromised by continuing resource extraction and development. We are concerned that the advocacy of this project by the Forest Service is yet another example of how the agency is taking the Green Mountain National Forest in the opposite direction from the stronger protection of forests, waters, wildlife, and recreational opportunities that is needed. Developments such as the proposed “hut” belong on private lands, which are plentiful in Vermont, not on our fragile, limited, and irreplaceable public lands.

If the Forest Service insists on moving forward with this harmful recreational “hut” project, the agency must complete a full Environmental Assessment that includes comprehensive research, analysis, and public involvement. The latter is at least as important as the first two factors, since there is significant public opposition to this unnecessary degradation of our publicly owned national forest for the benefit of private interests.

Thank you for the opportunity to comment on behalf of our members regarding this project. I look forward to updates and notices of future actions related to the project.

Sincerely

Michael J. Kellett
Executive Director

cc: John Sinclair, Forest Supervisor, Green Mountain and Finger Lakes National Forests
Phil MacAskill, Rochester Ranger District Recreation Program Manager