the fund for north bennington
a not-for-profit vermont corporation
p. o. box 803, north bennington
vermont 05257

RESPONSE TO PUBLIC COMMENTS
TEN-YEAR FOREST PLANS FOR
THE MILE-AROUND AND PARAN WOODLANDS

The Fund for North Bennington, Inc. (the Fund) appreciates the encouragement, support and helpful comments received on the two draft ten-year forest plans. We thank all of you who commented on the plans.

Summary of Response

We were encouraged by the broad support for the goals of the new plans. The public comments can be read at https://northbennington.org/summary-of-public-comments/

Several commenters voiced pointed concerns about the use of herbicides as part of the plans to manage invasives. Some comments also discussed alternative methods for controlling invasives.

The Fund shares these concerns. The plans call for use of herbicides to manage invasive species only when other means are not practical or would not be effective. The plans prescribe application protocols that are accepted by The Nature Conservancy and others as protective of the environment and public health.

In response to the stated concerns, the draft plans have been amended to emphasize alternatives to herbicide use when reasonably feasible. However, careful use of herbicides will be necessary to manage the extreme threat posed by invasive species to the health of the forest. The Fund has chosen to respond at length to explain the reasons why use of herbicides is included in the plans. Other changes to the plans have been made in response to suggestions from commenters.

The overarching goal of the two plans for the next decade is to increase the *resiliency* of our landscape's ecosystem, from its soil fungi to forest canopy.

After extensive conversations with a range of experts, we now recognize that the logarithmic increase in invasive species in recent years threatens the health and sustainability of our woodlands. They are not regenerating. If we keep hands off, the invasives will prevail.

Re-creation of the woodlands as they once existed is not a realistic objective. We neither expect nor plan to eradicate any particular plant species -- no matter how invasive. Yet even without full eradication, we can foster a more resilient and sustainable forest, provide more productive habitat for wildlife and model a path forward for other landowners.

This approach requires removing the heavy infestations that smother the ground, block light and suppress native forest plants. Invasive species at the concentration seen in our area change the composition of native ecosystems. They disrupt forest succession, species composition, nutrient cycling plus water absorption and circulation. They can create toxic growing conditions for other plants and animals.

The plans aim to promote an **ecological breathing space for key species** in the woodlands. The next decade will focus on giving a broad variety of invertebrates, plants and animals a chance to hold their ground. The plans aim to create conditions for these species to survive the current invasives onslaught, and perhaps even thrive.

.

Of particular concern are masses of barberry, bittersweet, buckthorn, honeysuckle, euonymus, and multi-flora rose. The infestations are extensive throughout the acreage (we were underwhelmed to hear that forest experts had never seen so thick a stand of honeysuckle nor so extensive a forest floor mat of euonymus). There is now minimal early-successional habitat in our woodlands. The forest floor is becoming a wasteland. Few native trees are successfully replacing the mature ones you see on your walks. Heavy browsing by deer and crowding by invasives together thwart native succession. Unfortunately, deer do not dine on invasives.

Forest resiliency will be lost if we do not curb invasive colonization. Our woodlands' ecosystem needs time to strengthen itself. The healthier and more diverse the forest becomes, the more resilient it can be to many stressors: extreme weather (did you notice how many of the trees felled by the recent ice storm were those weakened by a shroud of invasive vines?), new invasives whether plant, insect or microbe -- and to stressors not yet foreseen.

Methods

The two plans reflect months of consultation with representatives of the following organizations:

- Vermont Land Trust
- Nature Conservancy
- CISMA (partnership of federal, state, and local government agencies, et al. managing invasive species)
- Long View Forest
- Vermont Woodlands
- Vermont Center for EcoStudies
- Vermont Department of Fish and Wildlife
- Middlebury College, Environmental Studies

Each organization brought a wealth of conservation experience, with differences in concern and focus, and there were numerous site visits. The unanimity of their recommendations for the Fund was therefore striking. Each independently agreed that the ecosystem is threatened and that acting now to encourage resiliency is crucial. In their view resiliency rests on the biodiversity that is fast disappearing due to heavy infestations of invasive plants.

And the recommendations for how is this to be done? Based on years of experience and projects on thousands of acres, in their judgment every available approach must be used – and promptly. While no one rushes to use herbicides, the Plans follow the guidelines provided by the conservation organizations listed above. Their guidelines recognize the need for judicious use of chemical treatments as an adjunct to mechanical, burning and other growth-control methods – particularly in dense monoculture thickets. Our plan even provides room for use of goats to munch away invasives.

The plans tailor methods for maximum effectiveness and minimum disturbance of valued features – the ephemeral flowers will be safeguarded, equipment best suited will be targeted for invasive species present, degree of infestation, weather, and site conditions when work occurs. (This is why there were so many different units ecologically characterized in the Plans). For instance, hedges on level ground comprised only of towering buckthorn can be mechanically removed, while a single small barberry can be hand-pulled by community volunteers focused on getting the tap root. Massive bittersweet trunks strangling trees will be cut and the stump-ends painted with herbicide. Severely infested areas on less accessible slopes, where nothing is growing but an aggressive mat of invasives. will be carefully sprayed to limit the enormous seedbank the mat represents. Natives will be planted to take their place, and, in the second year, invasive sprouts sure to return will be hand-pulled or eaten down by a herd of goats (if a local herder will participate).

Ample public notice will be given before chemical application and the licensed experts (who have managed invasives control projects on many hundreds of Nature Conservancy acres) will ensure that their methods follow the strict licensure requirements and limited.

The draft plans have been amended to emphasize alternatives to herbicide use when reasonably feasible. However, careful use of herbicides will be necessary to manage the extreme threat posed by invasive species to the health of the forest.

Other changes based on comments

Comments on the utility of community workdays were encouraging to hear! We hope anyone who visits the Mile-Around Woods or enjoys the trails at Lake Paran will join in on (or help organize!) a Woods Resiliency Workday to combat garlic mustard, plant keystone native shrubs, limit the invasives seedbank by removing laden vines before seeds ripen or perhaps even watch over goats making short work of invasive shrubs. These trowel-and-shovel efforts are best for areas of particular sensitivity that have not yet been taken over by invasives e.g., the beautiful spring ephemeral flower habitats. The plans have been amended to recognize the value of these efforts, and also to encourage cooperation and cost-sharing with neighboring property owners in removal and disposal of invasives.

The Paran plan has been amended to encourage management of riparian areas to protect and enhance water quality. This expressly may include planting of native species. The plan would allow for bio-restoration projects to enhance water quality if carefully studied and consistent with the land management goals.

The project suggestions from Paran Recreations, Inc. were all positive and consistent with the mission of The Fund. Most of those suggestions are not matters that would appropriately be included in a forest management plan -- but they might well be pursued through other initiatives of The Fund or through community partnerships.

Efforts to date.

As some of commenters noted, efforts have already been underway (some with Bennington College staff and students) to support resiliency for the woodlands and its wildlife.

Baseline data is being collected to learn from what occurs over the coming decade. Efforts in recent years have included adoption of field management techniques to support nesting for grassland birds, commencement of baseline surveys of wildlife species, pollinators and plant species in selected areas, as well as a review of water quality of Paran Creek. More than 200 pollinator support shrubs were planted last spring – with the community's support, we hope to complete similar plantings every year.

Conclusion

Again, thank you for you for your interest in the conserved lands managed by The Fund for North Bennington, Inc. We encourage sharing of comments, concerns and suggestions as these plans for implemented. Success will require ample resources. We hope to secure the necessary funding to move forward and to assure the generations following us will enjoy resilient and healthy woodlands. The final versions of our plans are posted at https://northbennington.org/plans_2022/

Further comments or suggestions may be sent to threfund@northbennington.org.