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First name: Galina

Last name: Chernaya

Organization:

Title:

Comments: Thank you for the opportunity to comment on the Northern Escarpment Ecological Restoration & Fire Resilience Project (NEERFR). I am encouraged that the Green Mountain National Forest has expressed interest in protecting and restoring rare natural communities; however, I have substantial concerns and many unanswered questions about this large-scale, intensive project.

Although one of the project's stated goals is "restoration," the documents provided for review describe what is more accurately characterized as permanent ecosystem management, not restoration. Ecological restoration implies recovery toward self-sustaining systems, not indefinite human intervention. Natural forest succession and mesic species expansion are framed as degradation rather than as legitimate ecological trajectories. This reflects a value-based ecological assumption, not a neutral scientific assessment.

Below I summarize several—though not all—of my concerns:

1. Improper Use of a Categorical Exclusion

Categorizing a project of this scale and impact as a Categorical Exclusion is unacceptable. Its practical effect is to bypass the need for a thorough environmental assessment and to limit meaningful public engagement. The proposed treatment area of 2,770 acres appears deliberately selected to fall just below NEPA's 2,800-acre threshold (36 CFR 220.6(e)(25)), raising concerns that the project design was shaped to fit a predetermined regulatory shortcut. Overall, the proposal appears to search for a justification for a preferred solution rather than responding to a clearly demonstrated problem.

2. Failure to Analyze Reasonable Alternatives

The proposal fails to analyze a full range of reasonable, less impactful alternatives, including but not limited to:

- * Passive ecological restoration
- * Selective canopy thinning without prescribed fire
- * Non-fire oak regeneration strategies
- * Non-intervention conservation approaches

This omission constitutes a failure to meet NEPA's requirement to evaluate reasonable alternatives and results in a biased decision framework.

3. Failure to Use Best Available Science and Adhere to Sound Experimental Practice

As a scientist by training and profession, I was extremely disappointed by the lack of evidence demonstrating the use of best available science. Federal agencies are legally required to provide reasoned explanations, evaluate scientific uncertainty, and weigh all important aspects of an issue before approving a project. Simply posting articles in a project folder without explaining how they support the project does not meet this obligation.

The long-term fire history of the Northern Escarpment—and the ecological consequences of reintroducing fire—remain uncertain. Moreover, the proposal is framed as an experimental management approach applied across a very large landscape. A fundamental principle of sound scientific practice is to begin with a small-scale pilot study, allowing responses to be carefully monitored and measured, and to proceed to larger-scale implementation only if results support the proposed objectives.

Therefore, it is critical that the Forest Service first conduct burning and treatment in a small area and make the results publicly available. Moving forward with implementation at a large scale before the outcomes of such a study demonstrate that project objectives can be met is not warranted.

4. Questionable Fire-Regime Assumptions Under Climate Change

The project relies heavily on historical fire-regime assumptions that may no longer be valid under current and future climate conditions. Climate change is changing rainfall, wind patterns, fuel conditions, and how disturbances affect ecosystems. Reintroducing historical fire regimes under current climate conditions introduces ecological uncertainty and increases risk rather than resilience.

Additionally, the proposal calls for repeated prescribed fire entries (up to five per site over fifteen years), creating a compounded risk profile in which repeated ignition activities increase the cumulative probability of fire escape and unintended impacts on adjacent communities.

5. Risks to Rare and Sensitive Species

The project proposes active disturbance—including fire, mechanical cutting, herbicides and fencing, —within areas containing S1–S3 ranked natural communities and habitats for Regional Forester Sensitive Species, including the federally endangered Indiana bat. These habitats are being subjected to experimental management regimes without demonstrated long-term species viability.

The Forest Service should conduct and disclose site-specific surveys and analyses of rare, threatened, and endangered species as part of a thorough environmental analysis before closing public input on the project.

6. Herbicide Use in Protected Forest Systems

The project allows the use of triclopyr and glyphosate across up to 846 acres, with no clear limits on application frequency or quantity. A cornerstone study supporting glyphosate's safety has recently been retracted, and both chemicals pose risks to human health, soil health, ecological function, and potential PFAS contamination from so-called "inert" ingredients.

These chemical interventions directly contradict the project's stated goals of ecological integrity and natural community restoration by introducing persistent synthetic compounds into protected forest ecosystems. Public land managers should model forward-thinking ecological stewardship, not expand rationales for chemical use in some of the wildest landscapes in the region.

7. Absence of Carbon and Climate Impact Analysis

The proposal includes no carbon accounting or climate impact analysis. The Forest Service should estimate project-related carbon emissions and evaluate impacts on hydrology and long-term carbon sequestration. These considerations are essential for any large-scale management project on Vermont's public lands.

Beyond these procedural and scientific concerns, the project has direct implications for public access and community use of the forest. As a resident of Goshen and an almost daily hiker in the Silver Lake area, I am very familiar with the Chandler Ridge Trail, which is one of the areas proposed for treatment. Chandler Ridge is a beautiful and heavily used trail, and it is deeply troubling to consider that I and other users may need to avoid it due to proposed burns and herbicides use. I request that the Forest Service organize a staff-led public hike on the Chandler Ridge Trail this spring to allow for on-the-ground discussion of the proposal, its anticipated impacts, and public health considerations.

Conclusion

As proposed, the NEERFR Project is grounded in a historically framed ecological ideology that treats natural forest succession as degradation, substitutes permanent management for natural resilience, and applies experimental disturbance regimes to rare ecosystems under changing climate conditions.

The project:

- * Predetermines outcomes
- * Suppresses reasonable alternatives
- * Underestimates climate-related risks
- * Exposes rare species to experimental disturbance
- * Introduces harmful chemicals into protected ecosystems
- * Establishes permanent management rather than restoration
- * Lacks carbon and climate impact analysis
- * Fails to meet NEPA standards for objective environmental review

For these reasons, I request that the NEERFR Project be withdrawn, substantially redesigned, and subjected to a full environmental analysis, including meaningful consideration of alternatives, independent scientific review, and a robust risk assessment.

Thank you for the opportunity to submit this comment for the public record.