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Comments: The Trees as a Public Good Network is an advocacy network for protecting the forests and urban trees across Massachusetts and the New England region. Our volunteer network membership includes individuals, members of many other advocacy groups as well as scientists. We base our advocacy on studies published in peer-reviewed scientific journals.

We at the Trees as a Public Good Network OPPOSE the Northern Escarpment Project in the Moosalamoo NRA near Middlebury, Vermont, and we want to amplify the comments submitted by Standing Trees and the Save Public Forests Coalition.

The public deserves a more robust and transparent process for considering such a project, but so far, the rushed, haphazard process for this project has lacked sufficient evidence to support its plans and has ignored the best available science.

Forests that are wildlands[mdash]with passive management (no logging)[mdash]provide the best climate benefits, including the best water capture and storage, regional and global rainfall, stormwater and flood management, reduction of droughts and regional air temperatures, carbon capture and storage, and protection from wildfires.¹ The US Forest Service[rsquo]s own research shows that logging forests reduces that watershed[rsquo]s Ability to Produce Clean Water.² Other studies show that logging forests will also contribute to increasing regional near-land air temperatures for the northeastern region.³

1 DellaSala et al., 2011, [ldquo]Roadless areas and clean water,[rdquo] p.78A, <https://doi.org/10.2489/jswc.66.3.78A>; Moomaw et al., 2019, [ldquo]Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good,[rdquo] <https://doi.org/10.3389/ffgc.2019.00027>; Lesmeister et al., 2019, [ldquo]Mixed-severity wildfire and habitat of an old-forest obligate,[rdquo] p. 14, <https://doi.org/10.1002/ecs2.2696>.

2 USDA Forest Service, Forests to Faucets, https://www.fs.usda.gov/ecosystemservices/FS_Efforts/forests2faucets.shtml, ver. 12/20/2024.

3 Barnes et al., 2024, [ldquo]A Century of Reforestation Reduced Anthropogenic Warming in the Eastern United States,[rdquo] <https://doi.org/10.1029/2023EF003663>.

The proposed project would allow the use of triclopyr and glyphosate herbicides across up to 846 acres, despite studies showing that both these chemicals bring risks for human health, soil health, ecological function, and potential PFAS contamination from "inert" ingredients.⁴

Moreover, scientific evidence shows that logging increases risk of fires and the intensity of fires where they do occur.⁵ The stated goal of reducing so-called hazardous fuels is misguided: abundant evidence shows that home hardening, defensible spaces, and other measures taken in human communities[mdash]not wildlands vegetation treatments[mdash]are the most practical and effective ways to protect communities from fire.⁶ There is NOT clear scientific evidence that fire is necessary to regenerate oak and pitch pine in eastern forests.

The Forest Service needs to provide surveys and site-specific analysis of rare, threatened, and endangered species before closing public input on the project. We are particularly concerned about the federally endangered Indiana bat. The Forest Service also needs to estimate carbon emissions from the project and evaluate changes to hydrology and future carbon accumulation.

A large-scale burning, cutting, and herbicide project is NOT the way to [ldquo]restore[rdquo] natural communities on the Green Mountain Escarpment. The Forest Service needs to consider less-impactful alternatives.

4 Beyond Pesticides, 2017, [ldquo]Glyphosate (Roundup),[rdquo]
<https://www.beyondpesticides.org/assets/media/documents/pesticides/factsheets/bp.glyphosate.082017.pdf>; Soil Association, 2016, [ldquo]The impact of glyphosate on soil health,[rdquo]
<https://www.soilassociation.org/media/7202/glyphosate-and-soil-health-full-report.pdf>; Ruuskanen et al., 2023, [ldquo]Ecosystem consequences of herbicides: The role of microbiome,[rdquo] DOI: 10.1016/j.tree.2022.09.009; Donley et al., 2024, [ldquo]Forever Pesticides: A Growing Source of PFAS Contamination in the Environment,[rdquo] DOI: 10.1289/EHP13954.

5 Lesmeister et al., 2019, [ldquo]Mixed-severity wild?re and habitat of an old-forest obligate[rdquo]
<https://doi.org/10.1002/ecs2.2696>; Bradley et al., 2016, [ldquo]Does increased forest protection correspond to higher ?re severity in frequent-?re forests of the western United States?[rdquo]
<http://dx.doi.org/10.1002/ecs2.1492>; Coop et al., 2022, [ldquo]Extreme ?re spread events and area burned under recent and future climate in the western USA,[rdquo] <https://doi.org/10.1111/geb.13496>.

6 Calkin et al., 2023, [ldquo]Wildland-urban ?re disasters aren[rsquo]t actually a wild?re problem,[rdquo]
<https://doi.org/10.1073/pnas.2315797120>; Jack Cohen, 2023, [ldquo]A More Effective Approach for Preventing Wildland-Urban Fire Disasters,[rdquo] <https://sbcc.wa.gov/sites/default/?les/2023-11/WU%20Fire-effective%20approach.pdf>.