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Comments: Thank you for the opportunity to comment.

I cannot support this project if it calls for or allows any use of pesticides, with one significant exception: the Black Ash Swamp Preservation effort. I agree that the Black Ash Swamp is a significant ecological and cultural feature, and the proposed management approach is well thought-out.

Beyond protection of the black ash, I am not in favor of insecticide application without a specific proposal and a formal assessment process. Absolutely no blanket approvals. In addition, knowing that the state Agency of Agriculture tracks overall pesticide usage in Vermont, I cannot support ANY use of herbicides. Data show that the landscape has experienced a tripling of pesticide usage since Tropical Storm Irene, and much of that is herbicide. It is unconscionable to me that a federal agency, state agency, or county forester would endorse herbicide usage on land which has experienced four consecutive spring and summer seasons of extreme dry or drought. This is the case in most counties of the state, and even if normal precipitation levels return, living things need time to recover from such a prolonged state of stress. Drought plus herbicide plus climate change plus low soil organic matter plus legacy toxins are precisely what Cumulative Effects is all about.

A second justification for my view on pesticides in general is the development of glyphosate resistance in knotweed species, as documented by the University of Minnesota. Resistance to glyphosate and 2,4-D is becoming more common across a range of non-native species, and our incredible "solution" is to mix ever-more-powerful combinations of pesticide or to apply them more aggressively. This is a no-win scenario, and the US Forest Service should play no part in this downward spiral, especially since we have other options available, most notably education and prevention. If the reliance on herbicides is simply a matter of mindsets, then it is high time for those mindsets to evolve.