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Organization:

Title:

Comments: Thank you for your hard work in creating this notice of proposed actions in the Telephone Gap Integrated Resource Project. I appreciate the opportunity to give my comments and I am grateful to the many people whose comments I read. This project is clearly important and many people see that it's time for a significant shift in the way we regard nature and forests. I hope we can come together to find novel solutions as we protect this irreplaceable, awe-inspiring ecosystem. Trees, soil, stewardship, forests and community give my life meaning.

As a research associate at the University of Texas, I was employed to develop an early diagnostic test for oak wilt. As a member of the Montpelier Tree Board I participated with colleagues in the EAB "Slow the Spread" surveys; we planted hundreds of trees each year; we discovered the invasive snake worms in our Tree Board Tree Nursery, brought in on seedlings we acquired for replanting. We developed and offered education events to teach about soil health and the ecological services provided by trees. As a person who hikes, kayaks, fishes and once upon a time hunted, I know the incredible opportunity we have here with our Green Mountain National Forest.

I write in opposition to the following proposed actions presented in the Telephone Gap Project (TGIRP) notice:

1. Opposition to Proposed Actions, Concerns Related to Resources

A. The proposed timber treatments including clear cutting, individual tree selection, group selection, thinning, stand improvement or any type of treatment that involves establishing temporary and permanent roads in inventoried roadless areas in order to implement the treatments. The introduction of temporary roads into inventoried roadless areas with their currently protected, diverse and intact wildlife habitats increases the risk of:

1. introducing destructive invasive species and pathogens brought in from other projects on heavy equipment, gear and footwear, or seedling transplants

2. erosion of soil into sediments and introduction of petroleum pollution into high quality streams affecting trout, Regional Forester Sensitive Species (RFSS) such as the RFSS salamanders, turtles, and insects known to occur within the TG project area whose life cycles require clean water and undisturbed surrounding areas,

3. compacting soils thereby disrupting the ability of healthy soils to absorb storm water and increasing the risk of flooding and further erosion,

4. soil compaction that disrupts the natural interactions of microorganisms with plants to distribute nutrients in a delicate balance among diverse species thereby improving the health of the forest,

5. disturbing the breeding, nesting, and sheltering of sensitive and other diverse species in the areas.

B. The proposed enhancement of oak habitat with mechanical and herbicide treatments with the objective of maintaining and increasing red oak abundance.

1. Other commenters on this notice of proposed action have explained clearly how glyphosate and other herbicide treatments for many reasons don't make sense in ecologically sensitive areas - i.e. where living organisms interact with each other and the other living organisms in the soil, streams and air.

2. "We don't know what we don't know". The coming impacts of climate chaos will give us the opportunity to see just how much we didn't know.

3. And then there is the example of the red oak and oak wilt. The devastation of oak wilt in Texas is directly related to the over-development of monocultures of live oaks and red oaks on ranches in the Texas Hill Country. To be clear with regard to Vermont, oak wilt, its causal agent *Bretziella fagacearum*, and its vector, the nitidulid beetle, currently range from Texas up to Wisconsin and as far east as Ohio and Virginia. If temperatures moderate here in Vermont, the vector and the fungus may find the edges of the Green Mountain National Forest hospitable. We don't know. It has been traveling across the country, just like the fungus causing Dutch Elm Disease and the emerald ash borer infesting ash trees traveled to Vermont.

To unnaturally introduce red oak seedlings into Telephone Gap to increase their abundance, in this era shouting

for greater biodiversity, may be viewed in 40 years as the same mistake we made in planting only elms on Main Street in Montpelier, that we then replaced, in the 1970's, with mostly Ash trees.

I now write in support of the following proposed actions presented in the Telephone Gap Project (TGIRP) notice:

## 2.Support of Proposed Actions, Concerns Related to Resources

A.I support the removal of the dam to enable natural hydrological functions to process sediment that is currently held behind the dam (north of Forest Road 232) and to allow restoration of aquatic, fisheries, riparian and wetland habitats. I would like to see the process for dam removal be included in the environmental assessment to determine if there is an alternative to using the heavy equipment and if leaving smaller pieces of concrete to break down is the best way to deal with it.

B.I support the Forest Service upgrading the culverts to allow free transport of aquatic species.

C.I support Environmental Assessment of the Inventoried Roadless Areas and an Environmental Impact Statement to determine the need to reclassify these areas as Conservation Sensitive Roadless Areas.