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Comments: I submitted a comment regarding invasive earthworms on 7 April, 2024.

Comment # 420?

The agency does not regard these exotic pests as a measurable impact when they are introduced onto landscapes or spread further beyond known infestations. I carefully pointed out that recreation, maintenance work, and timber harvests are potential exposure events, whereby worms and their eggs may be moved into new locations. There is no reasonable way to "remove" earthworm populations once they have established.

It is general knowledge now that earthworm activity alters many soil characteristics as outlined in the Final Telephone Gap EA document. It is also known that tree regeneration, specifically sugar maples, is negatively impacted. This regeneration issue is not addressed in the EA; how can that be considered NOT a significant impact? The twisting of the logic makes debate pointless.

Yes, the impact of expanding earthworm populations is a slow, drawn-out event, but it occurs relentlessly and may even accelerate with warming temperatures.

The spread will definitely accelerate with equipment and new roads penetrating into roadless forest areas. We know this, and the agency proposes a vehicle-washing requirement in contracts as the solution? That's absurd; it is a release of control to third parties, when the true stewardship responsibility lies with the agency.

Who verifies that equipment is washed (trucks, bicycles, footwear) in winter when water is typically not found in liquid form? Where does the washing of equipment take place?

Here is a reference, since you asked me to include one:

<https://stewardshipnetwork.org/webcast/2024-12/>

This presentation is from Scott Tiegs of Oakland University.

One solution, aggressive but appropriate, would be the acknowledgment of biosecurity as a real threat and the installation of proudly maintained, supervised wash stations at access points around the forest. Treat the land for what it is - a treasure that yields clean water, clean air, and healthy trees. The higher, more secluded sections of the forest are the areas most likely to outlast the earthworms, so why is there no aggressive protection, no real address of the problem?

COVID taught us all how to practice detailed pest control and vigilance.

Other supporters of logging the forest have suggested Telephone Gap will be a model project.

Why not model the proper way to protect forestland with dedicated stewardship efforts like biosecurity awareness? Resource extraction ( logging in this case) is a path to long-term destruction, a deferral of the full impacts onto future generations. No justice there.

Dairy farmers, beekeepers, poultry farmers... the list goes on and on of operations / businesses that practice costly stewardship to keep pests under control. For the Forest Service to suggest that a contractual clause will keep earthworms out of harvest areas is just ludicrous.

I am always open to working with the agency, but that must begin with notions of open-mindedness and compromise. At this point, my concern has been dismissed as a non-issue, so we would need to begin with acknowledging the issue and the functional timelines involved.

As it stand now, I have to object to the project on a broad basis.

Thank you.