

Data Submitted (UTC 11): 1/17/2025 7:16:36 PM

First name: Michael

Last name: Bald

Organization:

Title:

Comments:

I object to the Telephone Gap project, consistent with my concerns expressed in comments from 16 Feb, 2023, and 7 April, 2024. The Forest Service has hugely under-estimated the presence and under-represented the impacts of several exotic plant species. The task is admittedly huge, and despite competent personnel, the agency has no capacity to successfully prevent crucial infestations from beginning and expanding.

There is also a fatal flaw in thinking that species like garlic mustard and Japanese stiltgrass can be contained or successfully mitigated. Success with stiltgrass has yet to be demonstrated in any state (CT, MA, MD). Successfully minimizing the spread of these two species in particular is a falsehood; even at minimal infestation levels, they will colonize new spaces, just like earthworms, and impacts on regeneration will be severe. The agency knows this; page 62 of the Final EA hopes for aggressive management after logging is complete, but who will do that work? What is aggressive management, heavy pesticide usage? That's completely unacceptable, but to open an interior forest to Japanese stiltgrass is even more irresponsible. Whatever "mitigation" took place after the recent Robinson project has been a failure; wild chervil is now well established. Stiltgrass is exponentially worse than chervil.

I have seen stiltgrass on skid trails and log landings in southern Vermont, and I have alerted state council personnel (VIEPAC, with a diverse, broad membership) that stiltgrass is in Addison and Rutland counties. If there was some technical expertise that I could contribute, I would certainly do so, but the only "solution" is prevention. The situation is frankly a crisis that we should be jumping on with full attention, but we have done nothing. Private lands within the project area are also a complete mystery regarding what plants are present and in what density; TS Irene worsened that predicament. My guess is that a short-staffed Forest Service has not been able to reach out to private landowners in any meaningful way.

There will be no greater good over the long run with this incredibly short-sighted focus on extraction and recreation. I do submit that any loss of timber resource jobs in Vermont could be 100% offset in tackling invasive species, but that would be a very new thing and a real stretch of comfort zones and mindsets.

Thank you.