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Comments: In addition to our concerns with the lack of an inclusive, and substantive review process, we have the following concerns about specific parts of the proposed action.

Hazardous fuels: The project's first stated purpose is to "reduce hazardous fuels in the project area," but are hazardous fuels actually a danger to human communities in the area, and, if so, is the proposal actually a reasonable way to address this risk? Besides the fact that only an average of 124 acres burn each year across the entire state, we don't understand how removing mid-story vegetation (which will increase wind speeds, one of the primary factors increasing fire damage to human communities) and encouraging more xeric, fire-prone species will reduce fire risk. Furthermore, abundant evidence shows that home hardening, defensible spaces, and other measures taken in human communities, not wildlands vegetation treatments, are by far the most practical and effective ways to protect communities from fire. If fire protection is the goal, our public agencies should be putting resources toward community protection, not large-scale, uncertain vegetation treatments.

Historic Fire Regimes and Natural Communities: What is the long-term history of fire and fire-adapted natural communities in the project area? The evidence the Forest Service has put forward deals with the recent, settler-colonial past in the 19th and 20th centuries, which was a time of exceptionally high fire occurrence because of clear-cut logging and other human activities. According to Forest Service "Landfire" data layers, only a small portion of the project area can actually be classified as a fire-adapted ecosystem - Northern Hardwood forests, which have a fire return interval of 650-1000 years, make up an astonishing 73% of the area that would be open to burning. How is applying prescribed fire up to 5 times in 15 years reasonable "restoration" for these areas?

Project map shows the extent of the four treatment areas in the Northern Escarpment Project.

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Regeneration of Oak, Pitch Pine, and other Desired Species: The Forest Service claims that burning and vegetation treatments are necessary to help oak, pitch pine, and desired shrubs regenerate, but evidence is far from clear on this. Vermont's most detailed guide to natural communities cautions that "other processes besides fire can maintain" dry oak forests, and monitoring at the the only comparable prescribed fire project the Forest Service has pointed to in Vermont shows that prescribed fire "did not stimulate the regeneration of oaks or ericaceous shrubs" like blueberry and early azalea. Many of New England's best examples of ridgetop pitch pine, meanwhile, do not have fire-adapted cones or show signs of fire as a major ecological process. The Forest Service needs to thoroughly consider deer browse, climatic, and other factors that likely affect species regeneration before diving into this impactful, large-scale project.

Endangered Species: 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, whose range is likely moving northeast and to higher elevations as the climate warms, and, even 20 years ago, was known in the GMNF Forest Plan (p. 27) to have potential roosting habitat in the Northern Escarpment project area.

Herbicide use: The project allows the use of triclopyr and glyphosate herbicides across up to 846 acres, with no specific limitations on how often or how much herbicide can be applied. A cornerstone study underpinning the safety of glyphosate (the active ingredient in RoundUp) was recently retracted, and both these chemicals bring risks for human health, soil health, ecological function, and PFAS contamination. Our public lands managers should be modeling forward-thinking, ecological management - not finding new rationales to apply chemicals to

native species in some of the wildest parts of our region.

Impacts to hydrology and carbon storage: The Forest Service needs to estimate carbon emissions from the project and evaluate changes to hydrology and future carbon accumulation. These are essential considerations for any 'management' project on Vermont's public lands, and receive little consideration in current project documents.

3. The Forest Service needs to consider alternatives:

A large-scale burning, cutting, and herbicide project is not the only way to "restore" natural communities on the Green Mountain Escarpment. The Forest Service needs to consider less-impactful alternatives, including alternatives which:

Let natural fires burn: If fire-adapted natural communities belong in the project area, natural processes should be able to maintain them. The Forest Service should analyze ways to let natural, lightning-caused fires burn, and focus on protecting communities as needed through home hardening, community planning, and defensible space.

Reduce the scale of the prescribed fire: According to the Forest Service's "Landfire" spatial data, only 15% of the project area could possibly be classified as a fire-adapted community. Much of the rest of the project area is Northern Hardwood forest, where there is no ecological justification for repeatedly burning up to 5 times in 15 years. The Forest Service needs to provide an alternative that targets prescribed fire and other interventions only on the existing areas of fire-adapted natural communities.

Eliminate the use of herbicides: Herbicides like Glyphosate and Triclopyr have many understudied, "profound" impacts. The Forest Service should pursue a project that accomplishes any needed restoration without resorting to the use of herbicides, especially on native plant species.

Maintain untreated controls: The long-term, natural fire history, and the impacts of applying fire on the landscape, are both far from clear for the Northern Escarpment Project. Given these uncertainties, the Forest Service should analyze an alternative that leaves some of the "ecological benefit" areas untreated by fire, cutting, and herbicides, to observe how they develop compared to the communities that are treated.