

Data Submitted (UTC 11): 2/12/2026 3:38:11 AM

First name: Michael

Last name: Bald

Organization:

Title:

Comments: This proposed project is disturbing for several reasons.

It seems completely out of scale, looking at the acreages involved and the fact that 3 different management areas are involved.

That is enough variation to call for deeper analysis.

Additionally, is it correct that the proposed work will overlap in time with at least two other impactful projects underway in the same or adjacent watersheds?

Do we understand compounding effects?

This appears to be a collection of distinct projects all combining to bring a massive impact to the north half of the GMNF.... have the projects been assessed collectively?

How can an agency in good faith execute the Telephone Gap project (with all the concerns it ignored) together with the Dutton II Oak / Chestnut Release Project and now this NEERFR Northern Escarpment project? During a seven year drought, no less!

This is an overwhelming amount of stress that if taken together would reveal serious shortcomings in planning, development of alternatives, and proposed mitigations.

My reading of project documents found no concern whatsoever with current drought conditions, not even an acknowledgment of that reality.

Do we realize that snowpack in Vermont has dropped ten percent per decade since the 1980s?

Is that not also a stress on the system?

I see a lot of cumulative stress that is being separated into far-flung silos, one project at a time.

Nor was there any acknowledgment of the impact of exotic earthworms on the duff and organic layers.

How can that be completely ignored? Did I miss a section?

There is plenty of description of fire's impacts on the forest floor layers, but the risk associated with exotic earthworms is apparently not even considered.

What if the soils do not recover from this management action?

What is the plan to remediate a project that fails?

Or a project that simply does not succeed?! I see no grasp of current forest realities that might possibly impact management outcomes.

That is dis-heartening as a taxpayer.

I'm equally stunned to see that yet again herbicides will be deployed on native species.

Hundreds of acres of potential chemical treatment adjacent to other projects also utilizing herbicides.

I bring your attention respectfully to the point I made in earlier project comments: that I need the agency to certify with laboratory testing results that all herbicide products, mixes, and formulations contain no PFAS / PFOA compounds.

The risk of PFAS contamination affecting local water supplies and the fact that pesticides carry a 5-fold CO2 footprint is full reason to exclude their usage altogether. But just the notion that herbicides will be used on native species, that notion alone is a disgrace to the agency.

Finally, I see no justification for much of the action regarding hemlock stands.

The referenced studies were conducted in southern climates and all date back a full decade or nearly a decade. Vermont is where HWA nears the edge of its expansion range due to winter temperatures.

Why are we experimenting with insect control variables that come from a completely different / warmer climate?

From ten years ago...

Again, I see no recovery options if this "experiment" does not go as hoped / planned.

The risk outweighs the reward very clearly.

This is science in the wrong place and at the wrong time.

Thank you for the opportunity to comment.