

Data Submitted (UTC 11): 4/5/2024 4:00:00 AM

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Title:

Comments: See attached comments, which were also filed by email to christopher.mattrick@usda.gov and john.sinclair@usda.gov

I am writing to strongly oppose the [ldquo]Telephone Gap Integrated Resource Project #60192,[rdquo] proposed for implementation on the Green Mountain National Forest. I am submitting these comments on behalf of RESTORE: The North Woods, a regional nonprofit organization with members and supporters in Vermont and across New England who regularly visit and enjoy the Green Mountain National Forest.

We have reviewed the [ldquo]Telephone Gap Integrated Resource Project Preliminary Environmental Assessment[rdquo] (EA), which was issued on March 8, 2024. We found the Forest Service[rsquo]s analysis of the environmental impacts of the project to be fatally flawed.

Among the many glaring shortcomings of the EA is the superficial and biased analysis of the direct, indirect, and cumulative environmental effects of the alternatives on forest habitat and diversity. For example, the EA states:

[ldquo]There is very little regenerating forest habitat (forests 0 to 9 years old) within the project area with just 57 acres located on unsuitable lands. Regenerating forest habitat is an important element of forest habitat diversity because it can provide quality early successional habitat conditions that are important for many species of wildlife such as ruffed grouse, woodcock, wild turkey, deer, black bear, moose, bobcat, and snowshoe hare, as well as many passerines such as the eastern bluebird, chestnut-sided warbler, common yellowthroat, song sparrow, and American goldfinch (Forest Plan EIS, p. 3- 102). Early successional characteristics change gradually over time up to 20 years, at which time their wildlife habitat benefits diminish.[rdquo] [p. 36]

The species described above as requiring early-successional habitat are common throughout their natural historic ranges. None of them are listed under the Endangered Species Act or meet any criteria to be categorized as imperiled. Many of them are popular game species, whose populations are so large and widespread that thousands of individuals are killed by hunters each year. They do not need the logging of standing forests to survive and thrive.

The EA claims that the current amount of early-successional habitat on the Green Mountain National Forest is insufficient and that logging and other intensive management is needed to expand it:

Early successional habitat, essential for migratory species, is on the decline across the region (Oswalt et al. 2019), and this habitat type was common, and seemingly valuable, prior to European colonization (King et al. 2023). It was suggested by public comments the premise for creating early successional habitat is flawed because it is based on consideration of manipulated habitat conditions created during post-European disturbance activities and the resulting increase of wildlife populations benefitting from the unnatural abundance of this habitat type (Kellett et.al., 2023). Prior land use has affected which species use or have used the project area over time, but the assumption to preclude the need for early successional habitat is not supported by most scientific literature (King and Schlossberg 2014, Littlefield and D[rsquo]Amato 2021, and King et.al.

2023) which conclude forests with a component of regenerating age class support more wildlife diversity on the landscape. [p. 36-37]

No credible scientific evidence is offered here or elsewhere in the EA to support these claims. I was a co-author of the paper cited negatively in this paragraph: Kellett et al., 2023, titled "[Forest-clearing to create early-successional habitats: Questionable benefits, significant costs]". This was a wide-ranging survey which was peer-reviewed and cited 500 references. It was published in a respected scientific journal, and has been viewed almost 16,000 times.

Kellett et al., 2023 concluded that:

"it is questionable that any species in [New England] needs artificial expansion of early-successional forest habitats to survive and thrive across its multi-state range[...]"

"there is ample evidence that these habitats remain plentiful across these regions (and are likely more prevalent than is accounted for currently), are considerably more abundant than [before European] presettlement, and continue to be created by natural and human disturbances—including by mounting climate change impacts." [p. 17-18]

The Telephone Gap EA contends that these findings are "[not supported by most scientific literature]". Yet the only evidence provided to support this claim is limited to three references, including what is referred to as "[King et al. 2023]". None of these references provide credible evidence that early-successional habitats were a significant part of the landscape in Vermont before European colonization, that they have dangerously declined, or that logging and other intensive management is needed to restore or maintain natural amounts of these habitats.

It is troubling that the EA cites King et al., 2023 [—] a "[review]" of Kellett et al., 2023 [—] among its three references as if it were a credible scientific paper. On the contrary, it is simply an informal statement of opinion, which has not been copy edited for misspellings and other errors, peer reviewed, or published. Perhaps this explains the presence of inappropriate comments that would have been excised by a professional publication, such as:

"The fact that ruffed grouse and woodcock are game species is irrelevant to their conservation status. Tigers and rhinoceroses are also game species."

No new information is provided in King et al., 2023 that refutes any of the statements, findings, and conclusions in Kellett et al., 2023. Its references consist largely of previous articles co-authored by the authors of King et al., 2023 and other advocates of intensive forest management for early-successional habitat. The authors of Kellett et al., 2023 were well aware of these articles and took them into account in our analysis. Only one of the articles cited in King et al. 2023 was published after Kellett et al., 2023, and it does not cite our paper or provide any new scientific evidence that refutes anything in our paper.

I note that the King et al., 2023 review was not shared previously with the authors of Kellett et al., 2023 and we were unaware of its existence until it was listed in the "[Literature Cited]" section of the EA. We were unable to find this review on the Forest Service's Northern Research Station website or through online searches. We finally obtained a copy from a colleague who had requested it from Forest Service staff. If this review had been shared with the authors of Kellett et al., 2023, we would have alerted the authors to its errors, omissions, and scientifically unsupported claims and would have proactively informed Green Mountain National Forest staff of these flaws.

The use of the unvetted King et al., 2023 review to justify landscape-scale logging and intensive forest management is part of a pattern throughout the entire Telephone Gap EA of scientifically unsubstantiated analysis of the environmental impacts of the project. Other than meeting the arbitrary and controversial goals of the outdated 2006 Green Mountain National Forest plan, the EA fails to demonstrate that the Telephone Gap

project would provide any substantive benefits. On the contrary, it is highly likely that the project would worsen climate change, fragment and degrade mature and old-growth forests, foul watersheds and drinking water supplies, and displace public outdoor recreation. Rather than a thorough assessment of these significant concerns, the agency simply cherry-picked references that support its preconceived plan of action.

As a result of these egregious flaws, the EA does not meet the standards of the National Environmental Policy Act, National Forest Management Act, Endangered Species Act, Clean Water Act, and other laws, and violates the intent of President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies (E.O. 14072).

We urge the Forest Service to choose Alternative A, No Action; terminate this ill-conceived, harmful, and unnecessary project; and protect the entire area in management categories that prohibit logging and other intensive management. The agency should also place a moratorium on all logging and other active forest management on the entire Green Mountain National Forest, at least until the Forest Service has completed a comprehensive update of its outmoded and legally deficient 2006 forest management plan.

Thank you for the opportunity to comment.

References

Kellett, M. J., Maloof, J. E., Masino, S. A., Frelich, L. E., Faison, E. K., Brosi, S. L., and Foster, D. R. (2023). Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. *Front. For. Glob. Change*. <https://doi.org/10.3389/ffgc.2022.1073677>

King, David, et al., (2023). Review of "Forest-clearing to create early-successional habitats: Questionable benefits, significant costs" by Kellett et al., 2023. USDA Forest Service, Northern Research Station. 9 pp. (Not available online).