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Comments: One of the many tragedies of the Forest Plan is that it seeks to create habitat for non-threatened game species at the expense of rare and threatened species that require specific contiguous deep forest to survive.

Scrub-shrub species will only be able to use clear cut habitat for about 10-20 years which is when the canopy closes. The populations of Ruffed Grouse and Woodcock are currently stable. "Historically, fire or blowdowns created openings, and there is evidence that birds may have evolved behavioral strategies for dealing with shifting patches of scrub-shrub". There are a number of ways that scrub-shrub habitat is present such as high pitch pine ledges, abandoned beaver ponds, wetlands, tree fall gaps of more than one tree, abandoned farm fields that remain useful for decades as opposed to clear cuts. (Ecology and Management of Scrub-Shrub birds in New England, Schlossberg/King).

It does not make any sense to manually create openings when the forest will do that by itself. The degradation that occurs with road building, soil disturbance, erosion, and invasive species introduction is not worth the risk. If the Telephone Gap Area is left untouched, the natural process of the older trees falling and creating gaps will create more habitat for the ground nesting birds. Especially as they are apparently adaptable to many different size openings. For example, take into consideration that if the ash trees are allowed to stand and the borer takes its toll, openings will be created. Additionally the opportunity for borer resistant trees to survive and strengthen the species is there.

Perhaps if the State is concerned about the sport bird populations, the Fish and Game department should lower the bag limit.

Now let's look at forest interior birds.

"Species distribution models reveal that breeding habitat loss occurred for 66% of the 54 most common species between 1985-2020 and is strongly associated with reduction of old age classes of forests". (Forest Degradation Drives Widespread Avian Habitat and Population Declines. 2022 Betts, et al). "Forest degradation may be the primary cause of biodiversity decline in managed forest landscape".

The Vt. Biodiversity Project recommends ecological reserves where natural processes can work over large areas and that large unfragmented habitat patches are needed to protect forest -interior birds and other area sensitive species. It continues that large numbers of breeding birds occur in the Northern part of the US and many require large areas of contiguous forest.

The National Park Service says that forest interior birds are sensitive to forest fragmentation. Many of our warblers and thrushes are part of those populations. Not only are birds dependent on forests, the forests are also dependent on the birds. (VT Ecostudies.org 2017 Status of VT Forest Birds).

"With active forest management the amount of edge habitat increases, exposing interior forest birds to pressure from nest predators such as jays and raccoons and brood parasitism from brown headed cowbirds. Many forest birds are sensitive, inhabiting only large, contiguous forest blocks, exhibiting higher density breeding success compared to smaller patches". (VT. Forest Bird Monitoring Program 30 year study) ( Wilcove 1985, Robinson et al 1995).

" While area-sensitive species may attempt to nest in smaller forest fragments, they are often unable to raise young due to increased rates of nest predation and /or brood parasitism ". (Whitcomb et al 1981).

So while we have evidence that the ground nesting birds are able to adapt to differing opening opportunities, we do not have evidence that the deep forest birds can adapt to increased exposure.

I strongly support Option A for the Telephone Gap Integrated Resource Area: DO NOTHING.