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Comments: From Bart Bouricius

I believe that A, the no management option has not been seriously evaluated with an assessment of all the pros and cons of this option.

Specifically, surveys of the recently listed endangered Northern Long-eared Bats of the genus *Myotis* on proposed areas for harvests have not been done. In areas located within the bat's range, and that involve potential impacts to the bat or its habitat, including tree removal, herbicide spraying, or any other modification of the habitat should require a detailed analysis combined with careful planning to comply with the Endangered Species Act (ESA). Section 9 of the ESA prohibits any "take" of an endangered species which may occur when actions directly harm endangered species or degrade its habitat. Therefore a take of a bat without an incidental take permit and an approved habitat conservation plan would be a violation of the ESA.

According to the Center For Biological Diversity the bats "live in mature interior forests and forage along wooded hillsides and ridgelines. Because of this, they're vulnerable to forest fragmentation from logging".

The Pine Marten which is known to exist a little south of this project is another endangered species which requires similar protection and seems to respond poorly to forest fragmentation "based on a significant decrease in capture rates observed across a series of increasingly fragmented landscapes. Martens were rarely detected in sites with >25% open areas, even though forest connectivity was still present." From the Journal of Applied Ecology. Here is the link: <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1046/j.1365-2664.1999.00377.x>

It is clear that a full Environmental Impact Statement should have been done and that the time frame to respond to the pages of material provided by the Forest Service is much too short and not in compliance with regulations regarding response time for comments to this many pages of material..

Bird population Damage

Forest degradation drives widespread avian habitat and population declines

from Nature Ecology & Evolution | VOL 6 | June 2022 | 709-719 | [www.nature.com/natecolevol](http://www.nature.com/natecolevol) 709

"The pattern of extensive harvest of old forest, followed by rapid regeneration of young forest appears to be common across many forest regions of North America, . . . . and can be considered 'forest degradation,' in that these practices simplify forest structure, reduce tree species diversity and truncate old-forest age classes".

This 2022 South Eastern Canada study is a large landscape scale documentation of a large decline of many bird species with management logging as a particularly important driver of the declines. Birds such as the Blackburnian warbler and Golden-crowned Kinglet and the Red-breasted Nuthatch are Vermont birds that seem to have been particularly severely damaged by cutting for early succession habitat. This is also caused by any cutting that removes most of an older forested patch. .

Forest degradation has a significantly larger impact on overall bird decline than does the amount of forested land available if that land is in poor condition. In other words, just keeping forests as forests will not stop bird decline if forests continue to be degraded by logging, especially for early successional habitat (ESH) or "young forest habitat". The conclusion of this comprehensive landscape scale study is that all but four of the 54 species studied

declined due to degradation of interior forest habitat. Other birds declining as a result of forest degradation that were not included in this study include the Wood Thrush, and the Cerulean Warbler.

According to Cornell Lab in a 2019 report birds in the US and Canada are down by about 3 billion individuals or a total of 53% since a 1970 bird census. It is critical for the Forest Service to consider the big picture of climate change and biodiversity loss in their policies. For example, in a recently released Massachusetts Report of the Climate Forestry Committee there was agreement that "passive management confers greater increases in carbon stocks than active, and that allowing forests to grow and age is typically best to maximize carbon storage."(page 6).