Data Submitted (UTC 11): 1/18/2025 12:24:07 AM First name: Barthold Last name: Bouricius Organization:

Title:

Comments: Out of date land use document ignores that a timber harvest negatively affects mature and old forest wildlife habitat and biodiversity. Animals affected may include long eared bat and certainly Canada Lynx: According to public records obtained by Standing Trees, a Canada Lynx was seen on September 3rd, 2024 walking just outside, of all places, the GMNF headquarters in Mendon! If Canada Lynx are traveling past the Forest Supervisor's office alongside the busiest road in the region, it is all but certain they are using much better habitat nearby in the heart of the Telephone Gap landscape. And yet, despite proof of the presence of Lynx in the Telephone Gap project area, the Forest Service stated in the Telephone Gap Biological Evaluation that "the gray wolf and Canada lynx are not known to occur within the project area on the GMNF, [and] they are not likely to occur within the project area in the foreseeable future." This is nonsense! The Forest Service must go back and analyze potential impacts to lynx.

The overly narrow focus on particular habitats rather than the whole functioning ecosystem leads to drastic loss of birds, as documented in the only large landscape scale study of bird populations relative to forest management: from Nature Ecology & Company, Evolution Forest Degradation Drives Widespread Avian Habitat and Population Declines Published: 28 April 2022 709-719

This paper showed that all but two species of the 54 species studied were in decline, primarily as a result of loosing the structure and composition found in older forests. In the Conclusion, the Authors say: "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". Most of the birds in this study nest or migrate through Vermont.