From: Jim Gray [mailto

Sent: Monday, September 16, 2019 11:24 AM

To: Moffat, Steverson -FS <steverson.moffat@usda.gov>

Cc: Brent Rudolph <BrentR@RuffedGrouseSociety.org>; Linda Ordiway (lindao@ruffedgrousesociety.org) lindao@ruffedgrousesociety.org>

Subject: RE: Buck Project Objection Period

Dear Steverson,

This email is to file an objection to the Buck Project on the basis that not enough is being done to improve wildlife habitat in the preferred alternative or any of the alternatives. I am basing my objection on the fact that ruffed grouse (and forest wildlife that utilize similar habitat as ruffed grouse – Golden Winged Warblers for example) are <u>not</u> a stable population in the Southern Appalachian Mountains – despite contrary statements in the Draft Buck Project Environmental Assessment document (pg. 42, Table 3.2.1; pg. 66, Forest-wide Trend). Data collected by the North Carolina Wildlife Resources Commission (NCWRC) over many years documents the decline in ruffed grouse populations in the state (see attached Avid Grouse Survey Summary 2018-2019). Especially important in this document are Figures 6 – 10. In addition, there is suspicion that West Nile Virus (WNV) is negatively impacting ruffed grouse populations throughout the Eastern United States including North Carolina. Extensive study by the state of Pennsylvania has shown that the best action to mitigate the effects of WNV is to provide ideal habitat at high altitude to minimize the exposure of ruffed grouse to mosquitoes. The NCWRC conducted a project with grouse hunters in the 2018-2019 hunting season to collect blood samples to determine the level of exposure of native ruffed grouse to WNV. That data should be released soon.

The Buck Project encompasses critical habitat for ruffed grouse in the Nantahala National Forest and every effort should be made to expand the needed Early Successional Habitat. In a project encompassing 20,638 acres, the proposed creation of 845 acres of Early Successional Habitat (ESH) is totally inadequate. I would be happy to work with the Forest Service experts to identify additional areas where ESH could be beneficially established. Also, since ESH has a relatively short life span, it is important that areas be identified where new areas can be established when existing areas age-out. Information I have received in the past from the Ruffed Grouse Society indicates that an ESH patch needs to be approximately 20 acres in size at a minimum. Therefore, the occasional forest opening created by a downed mature tree does not provide the needed habitat. We need ESH created by forest management and we need it soon to reverse the downward population trend of this important bird.

I am requesting that this objection be filed to the Buck Project and that I be provided an opportunity to speak at any Objection Meeting that is scheduled.

Best Regards, Jim Gray Ruffed Grouse Society member