



November 2, 2020

District Ranger(s)
Glenwood & Pedlar Ranger Districts
Bobbles Gap Vegetation Project Scoping Comments
27 Ranger Lane
Natural Bridge Station, VA, 24579

Dear District Ranger(s),

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS/AWS) and our members, thank you for the opportunity to comment on the “Bobbles Gap Vegetation Project” on the Glenwood and Pedlar Ranger Districts of the U.S. Forest Service’s (USFS) George Washington and Jefferson National Forest.

Established in 1961, RGS/AWS is North America’s foremost conservation organization dedicated to healthy forest habitat for ruffed grouse, American woodcock and all forest wildlife. RGS/AWS works to develop critical habitat utilizing scientific management practices. Our members are mainly grouse and woodcock hunters who support national scientific conservation and management efforts to ensure the future of the species. Our organization headquartered in Coraopolis, PA, employs a team of forest wildlife conservation professionals to work with private landowners, and government, including local, state and federal, land managers who are interested in improving their forest land for wildlife.

The Southern Appalachian Mountains are one of the most biologically diverse temperate forest ecoregions in the world (WWF, 2020). Southern Appalachian forests contain the highest tree species diversity in North America and rank the highest in terms of total endemic flora and fauna on the continent (The Nature Conservancy and the Southern Appalachian Forest Coalition, 2000). However, large-scale industrial land clearing in the early- to mid-1900’s and decades of fire suppression has resulted in ecological departure of Appalachian forests from healthy historic conditions. Today’s Appalachian forests consist of an overabundance of closed-canopy, mid-successional stands and a lack of young forests, open forests, and late-successional closed-canopy forests (Ponder, 2014).

This habitat degradation combined with habitat loss (conversion to non-forest) and habitat fragmentation (parcellation and development) has resulted in dramatic declines in forest wildlife populations, as evident by the long lists of Species of Greatest Conservation Need in Virginia’s Wildlife Action Plan (Virginia Department of Game and Inland Fisheries, 2015). Climate change poses an existential threat to the survival of many forest wildlife in the region, and many species have been identified as “climate-threatened” or “climate-endangered” (Schuetz et al., 2013). As species and natural communities shift northward in range due to climate change, wildlife species in the Southern Appalachians that are at the southernmost extent of their range are especially at-risk (e.g. ruffed grouse).

As the southernmost extent, ruffed grouse populations in the Central and Southern Appalachians are particularly vulnerable, emphasizing the urgency to conserve the species now before it is too late. Many of our members in the Southern United States consider the National Forests in the Central and Southern Appalachians the “crown jewel” of grouse hunting in the region because of the large land base, access, and opportunities for hunting. However, many of our members have seen the decline in grouse populations on the National Forests in this region over the past several decades.

Ruffed grouse have been declining throughout the multi-state Appalachian region for several decades at an annual rate of -1.5% and populations are declining at an annual rate as high as -3.1% in some states (Stauffer, 2011). It's estimated that grouse drumming male population density has declined 6 percent since 1980 across the Appalachian region, though actual grouse population decline is likely higher (Dessecker et al., 2006). This is mostly due to the loss of young, actively regenerating forests across the landscape (5-20 years old stands) interspersed across other forest successional conditions (Norman et al., 2004). In Virginia, grouse have had long-term population declines since the 1980's and current population levels are very low (Norman, 2014). **On a landscape scale, the Grouse Conservation Plan recommends increasing the current proportion of small-diameter forest in the Appalachian region by 10% to 7,290,000 (~12% total forestland) and sustaining that amount long-term (Dessecker et al., 2006).**

In the Eastern United States, American woodcock (*Scolopax minor*) have experienced long-term population declines of -1.08% annually (Seamans & Rau, 2019). The Appalachian Mountains are a critical region for connecting woodcock's primary wintering grounds in the Southern United States to the high-density breeding grounds in the Northern United States. Woodcock in the Appalachians require diverse habitats to survive, including small clearings, dense shrubland or young forest thickets with abundant earthworms, early successional forests, and clearings (Wildlife Management Institute, 2008). Across North America, woodcock are expected to lose 35 percent of their summer range by 2080 (Schuetz et al., 2013). Ensuring high quality habitat in the Southern Appalachians is key for ensuring habitat connectivity across the eastern United States. **The American Woodcock Conservation Plan recommends the creation of 3 million acres of new woodcock habitat across the Appalachian region to restore woodcock populations to those observed in the 1970's (Kelley et al., 2008).**

Ruffed grouse, American woodcock, and other disturbance-dependent forest wildlife (e.g. Appalachian cottontail) are at-risk in the Central and Southern Appalachians due to the loss of forest diversity (i.e., very young, very old, and open forest conditions) on a landscape-scale. Additional wildlife not traditionally considered “disturbance dependent” (i.e., cerulean warbler, wood thrush) have also been found through scientific research to depend on forest age diversity. The unnaturally single-aged forest that now dominates the region simply does not support the wildlife diversity that it should. The long list of forest wildlife listed as Species of Greatest Conservation Need (SGCN) in Virginia's 2015 Wildlife Action Plan is a testament to this (Virginia Department of Game and Inland Fisheries, 2015).

To achieve landscape-scale restoration goals and objectives, projects might need to exceed 12% on the project-level to contribute towards the broader landscape-level goal, especially on landownerships where timber harvesting occurs relatively infrequently, such as on the National Forests. The management on these lands will ultimately dictate not only the survival of ruffed grouse and imperiled forest wildlife in the region, but also the sustained opportunity for hunters to connect with nature and develop a conservation ethic.

The Bobblets Gap Vegetation Project scoping letter states that the desired percentages of early successional habitat are 4 percent in the 7F Blue Ridge Parkway Visual Corridor Management Area Prescription and 10% in the 7E2 Dispersed Recreation Areas (Suitable) Management Area Prescription. However, the scoping letter only proposes creating early successional habitat across 2.3 percent of the 7F prescription and 3.5 percent of the 7E2 prescription. **This level of early successional habitat creation is inadequate and will not meaningfully contribute towards achieving landscape-scale conservation and restoration desired conditions.**

We would like the USFS to increase the acreage of regeneration treatments in the project area to achieve more young forest conditions. Implementing enough regeneration treatments to achieve desired percentage of early successional habitat should be considered a minimum level of timber harvesting for the project. **We recommend the creation of early successional habitat across at least 10 percent of the 7E2 prescription area and 4 percent of the 7F prescription area. However, we also recognize that 20-25% young forest conditions would be a preferred goal for this project to meaningfully contribute towards landscape-scale goals and objectives, considering the lack of young forest conditions in the surrounding landscape.**

The next decade is a critical time for the health of our region's forests and wildlife. RGS/AWS recognizes that poor quality habitat and climate change pose threats to the survival of ruffed grouse in the Central and Southern Appalachians and nationally. Abundant and sustained grouse populations in the National Forests are critical for maintaining a vital link to the outdoors that sportsmen and women share and to perpetuate a conservation ethic in the region, not to mention the wildlife heritage and cultural importance of this forest bellwether. The restoration of our forests is not just a priority for sportsmen and women regarding hunting, it's also vital for the survival of grouse, woodcock, and all forest wildlife as a component of the Forests' overall biodiversity. RGS/AWS believes that active management is an invaluable tool in achieving the multiple-use mandate of the USFS, to achieve desired conditions under time constraints for rapidly declining species in a changing world, and to maintain a diverse portfolio of conditions (including carbon sequestration and storage) and management approaches that sustain the greatest good for the greatest number in the long run.

Sincerely,



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Southern Appalachian Region

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