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August 25, 2022

Johnida S. Dockens  
NEPA Planner  
White Mountain National Forest – Androscoggin Ranger District  
300 Glen Road  
Gorham, NH 03581-1399

**Re: White Mountain National Forest Androscoggin Ranger District Peabody West Integrated Resource Project**

**Atten: Johnida Dockens**

Thank you for allowing us to submit comments on the draft Environmental Assessment (EA) and Preliminary Finding of No Significant Impact for the Peabody West Integrated Resource Project.

RGS & AWS unites conservationists to improve wildlife habitat and forest health for ruffed grouse, American woodcock, and all forest wildlife. We promote forest stewardship for our forests, our wildlife, and our future. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for people to experience them. Ruffed grouse and American woodcock are bellwethers of forest condition; they can only persist in healthy, diverse forests. These same forests clean the air, filter water, and support local communities. Together with the American Woodcock Society (established in 2014), we work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

Overall, RGS & AWS applauds the White Mountain National Forest's Androscoggin District team for your efforts to promote forest resiliency and improve habitat diversity and other co-benefits associated with healthy, diverse forest landscapes. We strongly support science-based vegetative management activities like those incorporated in the Peabody West Integrated Resource Project proposal and RGS & AWS is available as a conservation partner to help the Forest Service move these projects forward.

Numerous bird and wildlife species require forest habitat diversity and are declining. These species that are identified in New Hampshire's Wildlife Action Plan as Species of Greatest Conservation Need include Ruffed grouse, American woodcock, Golden-winged warbler, Spruce grouse and New England cottontail. New Hampshire's State Wildlife Action Plan's *Chapter 5 Conservation Actions* section identifies habitat management as one of several important tools to address this challenge. Recommended actions include incorporating young forest habitat conditions across landscapes (Section 1402) and promoting sustainable forestry (Section 1410) which when coupled with other outlined strategies promote resilient forest landscape conditions with a spectrum of forest ages and robust species composition diversity.

Our technical comments regarding the proposed vegetative management activities follow below:

The Peabody West Integrated Resource Plan's is aligned with the White Mountain National Forest Land and Resource Management Plan's (LRMP) Chapter 1, page 20, Objective 4, which is to "provide regeneration age forest and open habitats to sustain biological diversity and support species that prefer those habitats". These activities also are consistent with the allowable forest management activities within MA 2.1 lands which work toward multiple use management and diverse co-benefits, including wildlife habitat and sustainable forest products.

White Mountain National Forest's LRMP *Chapter 2 Table 1-04: Age Class Objectives* establishes MA 2.1 guidelines for age class diversity by forest type, which targets 3-4% of the WMNF in young forest age groups for Northern Hardwoods and 12-15% in young forest conditions for Aspen-Birch types. The Draft Environmental Assessment (EA) report's Page 1 Para 4 notes that "*An analysis of the current habitat conditions indicates that the Peabody West HMU is not meeting MA 2.1 habitat composition and age class objectives (forest plan, pp. 1-20 to 1-21; U.S. Department of Agriculture, Forest Service 2022). Most of the habitats in the project area are mature, with some younger stands interspersed. The general lack of open forest conditions tends to promote the development of shade-tolerant species and limit birch and aspen, which need abundant sunlight*".

Page 2 Para 1 continues and states "*No regeneration-age (0-9 years old) forest habitat occurs in the Peabody HMU except for three permanent wildlife openings which are managed to maintain valuable grassy and shrubby habitat. These existing conditions create a need for management action to move the landscape toward the desired future conditions consistent with forest plan direction. Wildlife habitat objectives for the Peabody West HMU include the following:* • Increase spruce-fir habitat over the long-term • Increase age-class diversity and foster the regeneration of stands

Page 4 Para 6 notes that "*A range of silvicultural treatments would be used to provide commercial wood products; create small and large openings in the forest to allow regeneration of trees and other vegetation and increase wildlife habitat diversity; provide additional growing space to enhance crown and bole development; and encourage the establishment of shade-intolerant species in the understory*".

Page 5 Table 1 establishes the proposed acreage totals of silvicultural treatment for management area 2.1 lands in the Peabody West habitat management unit which result in 10.6% even-aged silviculture (235 acres) and 89.4% uneven-aged silvicultural practices (1,985 acres).

Page 8 Para 6 explains that for the 1,250 acres that will be treated as uneven-aged single tree and group selection combined, "*Groups would be placed in areas where desirable advance regeneration could be released to enhance species composition and/or increase softwood habitat. The size of individual openings under this treatment would range from a single tree crown width up to about 2 acres*".

One of the driving factors for shifting to more uneven-aged management is explained on Page 21 Para 5: "*The proposal is consistent with forest plan guidelines in considering cumulative impacts for scenery management (forest plan, p. 3-6). No other even-aged treatment has occurred in the analysis area in the past 30 years, and no reasonably foreseeable silvicultural proposals are identified within the analysis area. Therefore, the proposed action would not contribute measurably to cumulative scenery impacts in the analysis area*".

Ruffed Grouse Society & American Woodcock Society supports science-based sustainable forestry, promotes diverse forest landscape mosaics, and applauds the positive impacts this diversity has on resilience, climate, people, forests, and wildlife. Given that MA 2.1 is not meeting its habitat objectives and there is tension between scenery impacts and vegetative practices like even-aged silviculture, we are available to work with the Forest Service team in the future to identify ways to mitigate these tensions and ensure forest habitat conditions aren't overly compromised by aesthetic considerations. Regarding the single-tree and group selection silviculture, we're also eager to discuss spatial layout options and clustering techniques for the group areas to maximize positive wildlife habitat benefits.

Ruffed Grouse Society and American Woodcock Society is a supporter of the Peabody West Integrated Resource Project. As a national and regional conservation partner with members and a chapter in the Granite State, we support the Forest Service's efforts to initiate this project and we look forward to working with the agency as a key partner and stakeholder.

On behalf of our members and supporters, we thank you for your careful consideration and action to support healthy forests, abundant wildlife, climate solutions and promoting a conservation ethic in New Hampshire. RGS & AWS would be happy to comment further or address questions on these considerations in your future deliberations.

Respectfully submitted,

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*For more information visit the RGS & AWS website at [RuffedGrouseSociety.org](http://RuffedGrouseSociety.org). Follow us on Facebook and Instagram @RuffedGrouseSociety.*