

October 26, 2022

Jay Martin, North Zone NEPA Planner  
GW-Jefferson National Forest

Dear Jay Martin,

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS/AWS) and our members, thank you for the opportunity to comment on the draft Environmental Assessment (EA) of the Archer Knob Wildlife Enhancement Project on the North River Ranger District of the George Washington-Jefferson National Forest (GWNF).

Overall, RGS supports the project and the US Forest Service's efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. The Archer Knob Project is a necessary step toward accomplishing critical forest habitat and health goals identified in the George Washington Final Revised Forest Plan (2014). Though a necessary project, the Project is insufficient by itself in that it will need to be followed and augmented by significant additional forest management in the North River and other districts of the GWNF to attain the desired conditions in the Forest Plan.

Established in 1961, the Ruffed Grouse Society (RGS) is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with the American Woodcock Society (established in 2014), RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices. Our mission is to unite conservationists around wildlife habitat and forest conservation.

According to the Association of Fish and Wildlife Agencies (AFWA) Eastern Grouse Working Group report, ruffed grouse populations have declined 71% over the past 30 years in the Southern Appalachians. The Virginia Department of Wildlife Resource's 2014-15 Ruffed Grouse Status Summary report showed that ruffed grouse in Virginia have declined at an average annual rate of about 3% over the past several decades. This is mostly the result of a lack of habitat structural diversity and biologically significant levels of early successional habitat (ESH, forests with age structures of 5 to 20 years).

The Archer Knob Project will improve forest habitats for ruffed grouse and many other forest wildlife as well as improve forest health, resiliency, and climate adaptation. Currently in the GWNF, 4% of stands in MA 13 (Mosaics of Wildlife Habitat) are in ESH condition and only 2% of oak stands in MA 13 are open canopy structure, levels far beyond desired conditions detailed in the Forest Plan. RGS strongly supports moving forest conditions toward desired conditions described in Forest Plan, which include:

- Between 9 and 13% of the forests in Management Area 13 should be in ESH
- 60-80% of oak stands should be in open condition (canopy closure of 25-60%).

The table below contains data for the MA 13 from the Archer Knob EA; MA 13 acreage totals 13,993 acres.

	<b>Current conditions</b>	<b>Desired Conditions outlined in Forest Plan</b>	<b>In 5 yrs after project</b>	<b>In 10 yrs after project</b>	<b>In 15 yrs after project</b>	<b>Deficit from desired conditions in Forest Plan</b>
ESH	4%	9-13%	8%	15%	16%	Sufficient for 10-15 yrs until ESH habitat matures and 'ages out'
Open oak stands	2%	60-80%	5%	10%	12%	48-68%

The Archer Knob Project is a necessary step toward moving forest stands toward two critical habitat-oriented desired conditions outlined in the Forest Plan, roughly 4X increase of ESH and 6X increase of open oak stands.

Beyond wildlife habitat benefits from moving toward Forest Plan's desired conditions for ESH and open stands, the Archer Knob project will improve forest health, resiliency, and climate adaptation by improving the health and long-term viability of oak stands. Many types of oak forests, which are especially important for wildlife because of their hard mast production (acorns), are expected by the Northern Institute of Applied Climate Science (NIACS) to be particularly resilient and adaptable in the face of climate change.

However, a lack of disturbances, such as periodic ground fires, and the predominance of shade-tolerant species in the understory (the process known as mesophication), have led to a decline in oak seedlings, which threatens the long-term viability of oak forests. The Archer Knob Project will address the predicted loss of oaks and decline of oak forests through thinning and regenerating harvests. As proposed, the proposed project will address and even reverse these trends, which are dire for wildlife and resilience of the forest. Under the proposed project,

- Optimal hard mast forest will increase in 40 yrs from 7% to 16% which represents an increase of 95% compared to the current time; the no-action alternative will result in a 43% reduction in 40 yrs.
- Optimal hard mast forest will increase in 80 yrs from 5% to 13% which represents a 52% increase compared to current conditions; the no-action alternative will result in a 62% reduction compared to current conditions.

RGS supports many of the management actions in the proposed project, which are consistent with the best available wildlife management guidelines (see Managing Habitats for Ruffed Grouse in the Central and Southern Appalachians: <https://dwr.virginia.gov/wp-content/uploads/ruffed-grouse-habitats.pdf>). The project rightly focuses on improving management of many of the project area's drier sites, which have fire-adapted forest ecosystems such as oak and pine. Oaks are critical for grouse, given the importance of acorns in their diets, so management to increase mast production and regeneration success of oaks will also benefit ruffed grouse and many other wildlife species.

We do support the inclusion of the use of prescribed fire to restore forest conditions on over 2,400 acres in the project. Prescribed fire can improve habitat conditions including creating early successional and open-canopy stands.

Lastly, though the Archer Knob Project is necessary to move forest stands toward the desired conditions outlined in the Forest Plan, it is not sufficient. With respect to ESH, additional, ongoing management will be necessary to maintain sufficient levels as the managed stands with ESH mature and 'age out' of ESH conditions. Likewise, though the Project will significantly increase the percentage of open oak stands, it will not by itself get anywhere close to the desired condition of having 60-80% of oak stands in an open canopy condition. The Archer Knob Project will need to be followed by successive management over decades to attain and then maintain desired conditions.

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,

Ben Larson  
Mid-Atlantic Forest Conservation Director and Director of Forest Markets Strategy  
Ruffed Grouse Society & American Woodcock Society