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November 3, 2022

USDA Forest Service
ATTN: Chris Shaw, Project Leader
3714 Highway 16
Marion, VA 24354

Re: Currin Glade Vegetation Project

To Project Leader Chris Shaw

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS & AWS) and our members, I thank you for the opportunity to comment on the *Currin Glade Vegetation Project* on the Mount Rogers National Recreation Area of the George Washington and Jefferson National Forests.

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 (AWS), established in 2014, RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

According to the Association of Fish and Wildlife Agencies' 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 young forests (forests age structures of 5 to 20 years).

The Final Environmental Impact Statement (FEIS) for the Revised Land and Resource Management Plan (Forest Plan) of the Jefferson National Forest (the Forest) stated the following cumulative effects to ruffed grouse: "Habitats that benefit grouse and many other early successional species are currently in short supply across the Southern Appalachian Ecoregion... The trend appears to be further declines for this habitat in the future... Current supplies of quality grouse hunting areas do not meet the present demands of grouse hunters. This demand is likely to remain stable or increase over the next 10 years. Grouse numbers should increase slightly on Jefferson NF lands in the vicinity of habitat improvements such as management prescription 8E1 lands. Other areas will likely remain low in numbers because these habitats will not meet the special requirements of grouse. **Therefore, the slight increases in grouse numbers expected under this plan will not be sufficient to meet the demands of grouse hunters in the future.**" RGS & AWS is concerned about these findings and the inability of most Management Prescriptions on the Forest to meet the habitat needs for ruffed grouse and many other forest wildlife.

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The *Black Bear Habitat* Prescription (8C) of the Forest Plan has the following Standards:

- 8C-001 Limit creation of early successional forest habitat to 10 percent of forested acres outside of semi-primitive core areas (based on the contiguous prescription area).
- 8C-006 Manage for a diversity of oak species to minimize yearly fluctuations in acorn supplies.
- 8C-010 Regeneration harvest areas range in size from 2 to 40 acres.
- 8C-011 Primary regeneration harvest method is coppice with reserves with 15-25 square feet of basal area left to ensure adequate sunlight for oak regeneration and two-aged silvicultural systems, which leave 20-40 square feet of basal area per acre. In order to provide vertical diversity and future mast production, leave trees with a mean diameter of the codominant trees in the stand.

The Forest Plan describes the *Desired Future Condition* for this Management Prescription as, “4-10 percent of forested land outside of the semi-primitive core areas is in early successional forest conditions in order to ensure a steady supply of hard mast in the most productive age classes and ensure that oaks and other nut-producing trees are dominant components of the future forest. Early successional areas also establish and maintain a diversity of soft mast producing species so that berries and fruits are available in all seasons. Soft mast can mitigate the impacts of years when hard mast is low.”

RGS & AWS strongly supports the project and the Forest Service’s efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. We encourage the Forest Service to consider implementing regeneration harvests at the higher end of what is described in the Forest Plan’s Standards and Objectives for Management Prescriptions 8C to create early successional forest habitat conditions at biologically significant scales.

Given the concerning Forest-wide findings from the FEIS, RGS & AWS recommends the following habitat targets for this project based on the dominant management prescription area:

- **8C: 10 percent early successional forest habitat conditions well-interspersed across the project area with patches ranging from 2 to 40 acres in size.**

If these higher targets for early successional forest habitat conditions are unable to be attained for this Project due to access or merchantability, we recommend that the Forest Service *at least* meet the minimum habitat Standards and Objectives from the Forest Plan for these Management Prescriptions.

We appreciate the opportunity to comment.

Sincerely,



Nick Biemiller, Forest Conservation Director

Southern Appalachian Region

For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.