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**May 5, 2023**

USDA Forest Service  
ATTN: Beth Christensen, District Ranger  
110 Southpark Drive  
Blacksburg, VA, 24060

**Re: White Pine Removal Project #62011**

To Beth Christensen,

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 *White Pine Removal Project #62011* on the Eastern Divide Ranger District of the George Washington and Jefferson National Forests.

Established in 1961, the Ruffed Grouse Society (RGS) is a nonprofit 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 works with landowners and government agencies to develop critical wildlife habitats utilizing scientific management practices.

According to the Association of Fish & Wildlife Agencies' 2020 Eastern Grouse Working Group report, the ruffed grouse population has declined 71% over the past 30 years in the Southern Appalachians. Ruffed grouse decline in Virginia is hard to estimate, but the Virginia Department of Wildlife Resources' 2021-2022 Ruffed Grouse Status Summary report showed that ruffed grouse in Virginia have declined at an average annual rate of somewhere between 3-12% over the past several decades (Dye & Martin, 2021). This is mostly the result of a lack of habitat structural diversity and biologically significant levels of young forests (forest age structures of 5 to 20 years).

The Final Environmental Impact Statement (FEIS) for the Revised Land and Resources Management Plan (Forest Plan) of the Jefferson National Forest (the Forest) states the following cumulative effects on ruffed grouse: "Habitat 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 the habitat in the future ... Current suppliers of quality grouse hunting areas do not meet the present demands of grouse hunters. The 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 in the Forest to meet the habitat needs for ruffed grouse and a broad suite of forest wildlife.

The White Pine Removal Project will help the situation by increasing forest age class diversity in the project area and removing uncharacteristic white pine to restore mast-producing species (i.e., oak) that are more favorable to grouse and other wildlife. However, the project currently falls short of achieving early successional habitat (ESH) objectives for management prescriptions within the project area as outlined in the Forest Plan (see Table 1). The evidence shows that partial overstory removals with high residual basal area (>35 square feet per acre) and small patch opening harvests (<3-5 acres) don't provide the same habitat benefits for early successional obligate wildlife species as complete overstory removals (<35 square feet per acre) and large patch openings (>3-5 acres) (Fearer & Stauffer, 2003, 2004; Golden-Winged Warbler Working Group, 2013; Greenberg et al., 2018; Jones & Harper, 2004). Therefore, of the proposed treatments, it's likely that only the "Stand Type Conversion Harvest" and "Thinning with Patch Clearcuts" treatments will create functional ESH for wildlife.

Management Prescription	Early Seral Objective (Forest Plan)	Proposed Treatments That Will Create ESH (<35 residual BA)	Total Acres of Management Prescription in Project Area	Percentage ESH Proposed for Management Prescription	Surplus – Deficit (based on Maximum Allowed in Forest Plan)
8A1. Mix of Successional Habitats	4-10%	120	8,518	1.41%	-8.59%
7B. Scenic Corridors	up to 4%	0	602	0.00%	-4.00%
9A1. Source Water Protection	up to 4%	235	11,946	1.97%	-2.03%
8E1. Ruffed Grouse/ Woodcock Habitat	10-16%	94	894	10.51%	-5.49%
TOTAL		449	21,960	2.04%	

Table 1: ESH outputs from project by management prescription compared to Forest Plan objectives.

**RGS & AWS supports the project and offers the following suggestions to ensure that the project meets its goal of improving forest resilience, increasing species and structural diversity, and providing high-quality habitat:**

1. Maximize ESH creation to the extent possible within the project's parameters, the main goal of which we acknowledge is to restore off-site white pine stands to a more natural species composition.
2. Utilize silvicultural treatments that will create functional ESH for wildlife species and regenerate hardwood and yellow pine tree species. This means moving stands that are currently proposed as "Free Thinning" and "Variable Retention Thinning" treatments to "Thinning with Patch Clearcuts" or "Stand Type Conversion Harvest". For stands with a higher portion of hardwood trees in the overstory, consider

implementing a shelterwood harvest (establishment cut or overstory removal) instead of the currently proposed treatments.

3. Grapevines should be retained, when possible, especially in the 8E1 prescription areas. Grapes are a very important food source for grouse and other game and nongame species, and the vines also provide excellent cover for grouse. Because the vines can deform, suppress, and kill crop trees, it's understood there will have to be a balance between providing this important habitat feature and protecting timber values.
4. Grouse drumming logs should be retained or recruited in harvest units in management prescription 8E1. Logs at least 10 inches in diameter and 10 feet long located on upper slopes and ridgetops or above logging roads have been found to be preferred by grouse in the Appalachians. Standard 8E1-003 from the Forest Plan calls for "an average of one large (>12" DBH) down trees per acre as drumming logs."
5. We believe there's alignment between efforts to establish or release oak trees and promote high-quality young forest habitat. We support the use of prescribed fire as a tool to establish oak regeneration and encourage the Forest Service to implement post-harvest burning as a tool, as well as to increase soft mast-producing plans and boost invertebrate populations. Once oak is established, we encourage the Forest Service to implement a fire-free period to allow oak recruitment and to provide the high woody stem density, young forest habitat that ruffed grouse depend upon while also encouraging the development of high-quality crop trees.

We appreciate the opportunity to comment.

Sincerely,



Nick Biemiller, Forest Conservation Director  
Southern Appalachian Region