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Nicole Taylor
East Zone NEPA Planner
2375 KY Hwy 801 South
Morehead, KY 40351

Submitted electronically via portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64521>

Re: Ruffed Grouse Habitat Enhancement Project

Dear Forest Supervisor Scott Ray and Staff,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Ruffed Grouse Habitat Enhancement Project on the Cumberland Ranger District of Daniel Boone National Forest (DBNF). RMEF's mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. We represent more than 225,000 members nationwide and over 2,200 members in Kentucky. Since our inception in 1984, RMEF has conserved or enhanced more than 8.6 million acres of North America's most vital habitat for elk and other wildlife, including 196 conservation and hunting heritage outreach projects in Kentucky with a combined value of more than \$9.9 million. As such, RMEF has a vested interest in ensuring the sustained productivity of elk, other wildlife, and habitat conditions in Kentucky.

RMEF commends DBNF on proposed prescriptions that will meet goals of the current Forest Plan and the Kentucky Department of Fish & Wildlife Resources' Ruffed Grouse & Young Forest Strategic Plan. Timber harvest, prescribed fire, and treatment of non-native invasive plant species will significantly enhance current habitat conditions that are experiencing widespread expansion of red maple and tulip poplar following ice storm damage and subsequent salvage harvest from 2008-2017. While treatments will offer direct benefits to nesting, brood rearing, and foraging habitats for ruffed grouse- this Project will support active forest management efforts to create a mosaic of forest stand age classes while establishing early seral habitat in the Cumberland Ranger District; the latter of which is a significantly limiting habitat component throughout DBNF.

RMEF appreciates the challenges of managing lands federally designated as working forests, and offers the following additional comments with respect this this Project:

- Proposed treatments applied to select management compartments within the 5,000-acre Ruffed Grouse Habitat Enhancement Project will offer significant benefits to forest health, wildlife habitats, and recreational pursuits on the Forest.
- RMEF appreciates the scale of this Project as modelling simulations suggest greater population-level persistence of ruffed grouse under a scenario where high-quality habitat is provided in fewer large blocks as opposed to many small blocks (Blomberg, E. J., B.C. Tefft,

J.M. Reed, and S.R. McWilliams. 2011. Evaluating spatially explicit viability of a declining ruffed grouse population. *Journal of Wildlife Management* 76,3: 503–513).

- Application of silvicultural treatments to promote hard and soft mast-bearing trees in treatment areas would enhance native forage conditions for elk, ruffed grouse, and a host of game and non-game wildlife species (Nanney, J.S. 2016. Forage availability and nutritional carrying capacity for cervids following prescribed fire and herbicide applications in young mixed-hardwood forest stands in the Cumberland Mountains, Tennessee. Master's Thesis, University of Tennessee).
- Resulting improvements to general forage conditions for wildlife will enhance the experiences of consumptive and non-consumptive visitors to the Cumberland Ranger District.
- Employing prescribed burns will establish and maintain early seral habitat, deter re-establishment of non-native invasive species, and lessen fuel loads that promote catastrophic wildfires.
- Commercial and non-commercial timber harvests will support the renewable products economy of eastern Kentucky while generating local employment opportunities.
- Proposed post-treatment conditions will mimic disturbance observed following significant ice storm damage from the early 2000s that generated early seral conditions and subsequent increases in abundance indices for ruffed grouse.
- A focused emphasis on active forest management for ruffed grouse on this Prescription Area is included as an objective in the Forest Plan (2004); ongoing declines in ruffed grouse over the last decade support increased efforts to promote early seral forest conditions.
- Pursuing this Project as a Categorical Exclusion under the National Environmental Policy Act will expedite improvements to structural diversity and forage conditions for wildlife on the Cumberland Ranger District, while affording continued maintenance of desired forest stand conditions.
- RMEF appreciates that the U.S. Forest Services has considered science-based practices to accomplish these Plan goals.

RMEF looks forward to continued collaborations with Daniel Boone National Forest and appreciates the opportunity to review and comment on the Ruffed Grouse Habitat Enhancement Project.

Sincerely,



Steven Dobey

Senior Conservation Program Manager, Eastern U.S.