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**National Forests in North Carolina ATTN:
Objection Coordinator**
160A Zillicoa St.
Asheville, NC 28801

Re: Nantahala Mountains Project Objection

To Whom it May Concern:

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS & AWS) and our members, I thank you for the opportunity to object to the *final Environmental Assessment (EA)*, *draft decision notice (DN)*, and *finding of no significant impact (FONSI)* for the Nantahala Mountains Project.

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 in December 2020, ruffed grouse populations have declined 71% since 1989 in the Southern Appalachians (Eastern Grouse Working Group, 2020). The report identified that, "Loss of young forests across the landscape is the primary driver of this decline" (Eastern Grouse Working Group, 2020). The species is identified as a Species of Greatest Conservation Need in North Carolina's State Wildlife Action Plan (North Carolina Wildlife Resources Commission, 2015).

Ruffed grouse are a reliable indicator for healthy, diverse forest ecosystems (Norman et al., 2004). The lack of forest age-class and structural diversity is a driver of decline for multiple at-risk wildlife species in the region, including species traditionally thought of as "disturbance-dependent" and "mature forest obligates" that both benefit from a biologically significant mix of young, open, and late-successional forest conditions across the landscape (Bakermans et al., 2011; Golden-Winged Warbler Working Group, 2013; Jacobs & Warburton, 2016; Lambert et al., 2017; Wildlife Management Institute, 2008; Wood et al., 2013).

Urgent action is needed at the landscape scale, above and beyond localized habitat improvement efforts, to halt the decline in ruffed grouse and other forest wildlife in western North Carolina before it is too late.

The best available science suggests that maintaining 8-14% early successional habitat across the Nantahala and Pisgah National Forests would optimize for bird diversity, including “young forest obligates” and “mature forest obligates” (Jacobs & Warburton, 2016). We recognize that these forests are not managed solely for bird diversity and that many other interests must be considered in a multiple use forest. However, to ensure viable wildlife populations are maintained long-term; it is essential that vegetation management projects work to create a pathway to maintain early successional habitat conditions somewhere within the 8-14% range across the Nantahala and Pisgah National Forests.

On September 30, 2022, RGS & AWS submitted comments regarding the Nantahala Mountains Project. The objections below are based on previously submitted comments.

- Issue:** The final environmental assessment (EA) highlights that this project will not result in young forest habitat creation that aligns with desired conditions from the Land Management Plan (LMP) based on the natural range of variation in forest seral classes for the ecological zones within the project. The natural range of variation (NRV) model that was included in the LMP and final Environmental Impact Statement (EIS) established desired conditions for each ecological zone to maintain ecological integrity across the Nantahala and Pisgah National Forests (see Figure 1).

Figure 1: Natural Range of Variation Model from the final LMP and EIS.

Seral Class	Spruce Fir	Northern Hardwood	High Elevation Red Oak	Acidic Cove	Rich Cove	Mesic Oak	Dry Mesic Oak	Dry Oak	Pine Oak Heath	Shortleaf Pine Oak Heath	Alluvial Forest and Floodplain
Young	14-17%	5-7%	14-18%	4-5%	4-5%	4-6%	5-7%	9-22%	11-19%	8-13%	6-8%
Mid-closed	10-11%	17-23%	16-21%	27-32%	27-32%	12-15%	7-9%	2-7%	1-5%	1-4%	30-36%
Mid-open	2-4%	2-3%	11-14%	4-6%	4-6%	12-16%	13-17%	12-19%	34-42%	34-42%	9-14%
Late-closed	9-11%	11-14%	11-13%	9-11%	9-11%	8-10%	7-8%	1-3%	1-5%	1-4%	8-9%
Late-open	5-8%	2-3%	11-13%	1-2%	1-2%	5-7%	7-9%	6-9%	20-27%	22-26%	3-4%
Old growth-closed	36-45%	40-50%	6-10%	46-54%	46-54%	27-34%	22-28%	5-16%	1-3%	1-4%	22-30%
Old growth-open	12-16%	11-14%	18-26%	NA	NA	20-25%	28-33%	40-57%	11-26%	16-29%	9-13%

The final EA for the Nantahala Mountains Project states that the project will result in 411 acres of young forest creation (1.6% of the total 24,943-acre project area). RGS & AWS supports the young forest creation that is currently planned and recognizes that this will contribute towards moving the landscape towards more desired conditions. However, 1.6% young forest creation is much less than the desired conditions for young forest established in the NRV model for ecological zones present within the project area, which ranges from 4-22% depending on ecological zone. As such, this project does not go far enough to create and maintain the ecological integrity of the forest and does not create enough young forest habitat to have a biologically significant positive impact on wildlife species that require young forest conditions.

Requested relief: Increase the amount of active forest management to create young forest conditions within the project to ensure that the forest is within its natural range of variation and that ecological integrity is being maintained.

Consistency with RGS & AWS comments: In 2022, RGS & AWS submitted comments to the Nantahala Mountains Project wherein we encouraged the Forest Service to consider increasing the amount of active forest management to contribute towards achieving Forest-wide and management area specific young forest desired conditions in the project's analysis area. However, the amount of young forest creation did not change between the draft EA and final EA. Therefore, we feel that the project is still falling short.

RGS & AWS commends the Forest Service's efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. There's a lot about the Nantahala Mountains Project that we support. However, the current project's goals for young forest creation fall short of making a meaningful contribution towards young forest desired conditions outlined in the NRV model of the LMP and EIS to maintain ecological integrity on the Nantahala and Pisgah National Forests. We acknowledge that there are limitations to what the Forest Service can achieve on its own with its current capacity. The LMP established Tier 2 objectives based on what the Forest Service could achieve with the help of added capacity from partners. To achieve higher levels of young forest creation within this project, we encourage the Forest Service to collaborate with partners to plan and implement more active forest management work through Shared Stewardship.

We appreciate the opportunity to object.

Sincerely,



Nick Biemiller, Forest Conservation Director

Southern Appalachian Region

Ruffed Grouse Society & American Woodcock Society

Lead Objector

Works Cited

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