RUFFED GROUSE SOCIETY | AMERICAN WOODCOCK SOCIETY

April 26, 2024

Kevin Kyle, District Ranger
James River/Warm Spring Ranger Districts
422 Forestry Rd
Hot Springs, Virginia 2444

Dear Mr. Kyle,

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS/AWS) and our members, thank you for the opportunity to comment on the "Dunlap Creek Vegetation Project" on the James River and Warm Spring Ranger Districts of the U.S. Forest Service's (USFS) George Washington and Jefferson National Forest.

Established in 1961, RGS/AWS is North America's foremost conservation organization dedicated to healthy forest habitat for ruffed grouse, American woodcock and all forest wildlife. RGS/AWS works to develop critical habitat utilizing scientific management practices. Our members are mainly grouse and woodcock hunters who support national scientific conservation and management efforts to ensure the future of the species. Our organization headquartered in Pittsburgh, PA, employs a team of forest wildlife conservation professionals to work with private landowners, and government, including local, state and federal, land managers who are interested in improving their forest land for wildlife.

Across North America, ruffed grouse are considered "climate endangered" and are projected to lose 34 percent of their breeding range by 2080[1]. As the southernmost extent, grouse populations in the Central and Southern Appalachians are particularly vulnerable, emphasizing the urgency to conserve the species now before it is too late. Many of our members in the Southern United States consider the National Forests in the Central and Southern Appalachians the "crown jewel" of grouse hunting in the region because of the large land base, access, and opportunities for hunting. However, many of our members have seen the decline in grouse populations on the National Forests in this region over the past several decades. Ruffed grouse have been declining throughout the multi-state Appalachian region for several decades at an annual rate of -1.5% and populations are declining at an annual rate as high as -3.1% in some states[2].

Climate change exacerbates stresses and combined with poor habitat poses an existential threat to ruffed grouse in the Central and Southern Appalachians. As such, ruffed grouse are characterized as

[1] National Audubon Society. 2013. Developing a Management Model of the Effects of Future Climate Change on Species: A Tool for the Landscape Conservation Cooperatives. Unpublished report prepared for the U.S. Fish and Wildlife Service.

[2] Stauffer, D. F. (2011). *Ecology and Managemnet of Appalachian Ruffed Grouse* (J. W. Edwards, W. M. Giuliano, & G. W. Norman (eds.)). Hancock House.

a "climate endangered" bird by the National Audubon Society's Birds and Climate Change Report[3]. As the southern extent of ruffed grouse range, the Central and Southern Appalachians are a critical region. The declining population trends of grouse in the mountains are a cause for concern and provide notice to negative trends nationally. The situation in the Central and Southern Appalachians emphasizes the urgent need to act *now* to save this species and others that benefit from similar forest habitat conditions. To mitigate climate change effects and increase population resilience for ruffed grouse and forest wildlife, we expect the USFS to commit to managing for diverse forest ages to provide a balanced portfolio between carbon storage and carbon sequestration. We recognize that working forests are compatible with achieving climate mitigation and climate adaptation goals.

In the eastern United States, woodcock populations are experiencing long-term declines of -1.08% annually[4]. The Appalachian Mountains are a critical region for connecting the primary woodcock's wintering grounds in the Southeast United States to the high-density breeding grounds in the Northeast United States. To restore woodcock population densities to those observed in the 1970's, the American Woodcock Conservation Plan recommends the creation of 3 million acres of new woodcock habitat across the Appalachian region[5]. Across North America, woodcock are considered "climate threatened" and are expected to lose 35 percent of their summer range by 2080[6]. With climate change, ensuring high quality habitat in the Southern Appalachians is key for ensuring habitat connectivity across the eastern United States.

Ruffed grouse, American woodcock, and other disturbance-dependent forest wildlife (e.g. Appalachian cottontail) are at-risk in the Central and Southern Appalachians due to the loss of forest diversity (i.e., very young, very old, and open forest conditions) on a landscape-scale. Additional wildlife not traditionally considered "disturbance dependent" (i.e., cerulean warbler, wood thrush) have also been found through scientific research to depend on forest age diversity. The unnaturally single-aged forest that now dominates the region simply does not support the wildlife diversity that it should. The long list of forest wildlife listed as Species of Greatest Conservation Need (SGCN) in Virginia's 2015 Wildlife Action Plan is a testament to this[7].

In Virginia, grouse have had long-term population declines since the 1980's and current population levels are very low[8]. On a landscape scale, the Grouse Conservation Plan recommends increasing the current proportion of small-diameter forest in the Appalachian region by 10% to 7,290,000 (~12% total forestland)[9] and sustaining that amount long-term. To achieve this, projects might need to exceed 12% on the project-level to contribute towards the broader landscape-level goal, especially on landownerships where timber harvesting occurs relatively infrequently, such as on

[3] National Audubon Society. 2013. Developing a Management Model of the Effects of Future Climate Change on Species: A Tool for the Landscape Conservation Cooperatives. Unpublished report prepared for the U.S. Fish and Wildlife Service.

[4] Seamans, M. E., & Rau, R. D. (2019). *American Woodcock Population Status, 2019*. https://doi.org/10.24926/aws.0103

[5] Kelley, J., Williamson, S., & Cooper, T. R. (2008). *American Woodcock Conservation Plan: A Summary of Recommendations for Woodcock Conservation in North America* (Issue February 2008).

[6] National Audubon Society. 2013. Developing a Management Model of the Effects of Future Climate Change on Species: A Tool for the Landscape Conservation Cooperatives. Unpublished report prepared for the U.S. Fish and Wildlife Service.

[7] Virginia Department of Game and Inland Fisheries. (2015). *Virginia's 2015 Wildlife Action Plan.*

[8] Norman, G. W. (2014). *2014-15 Ruffed Grouse Status Summary*.

[9] Dessecker, D. R., Norman, G. W., & Williamson, S. J. (2006). *Ruffed Grouse Conservation Plan*.

the National Forests. As described in the Scoping Letter, the last timber harvest in the project area occurred in the early 2000's. The management on these lands will ultimately dictate not only the survival of ruffed grouse and imperiled forest wildlife in the region, but also the sustained opportunity for hunters to connect with nature and develop a conservation ethic.

The Dunlap Creek Vegetation Project will increase the forest's structural and age-glass diversity and provide critical habitat for ruffed grouse, woodcock, and other forest wildlife while moving structural composition toward desired conditions by ecological system. As the EA states, in the project area, desired percentage of early sucessional structure is 4% in cove forests, with only 2% existing, 12% in oak forests and woodlands, with only 5% existing, and 13% in pine forests and woodlands, with only 2% existing. The 429 acres of planned regeneration treatments will create about 2.6% of additional early successional habitat across all ecological systems, which is a necessary but insufficient improvement in the percentage of early successional habitat. The thinning, forest stand improvement, and prescribed fire may create additional valuable early and open-canopy forest habitat, but we would like the USFS to increase the acreage of regeneration treatments in the project area to achieve more young forest and open forest habitat conditions. Implementing enough regeneration and intermediate treatments to achieve desired stand and structural conditions by ecosystem group should be considered a minimum level of timber harvesting for the project. **We recommend 20-25% young forest conditions as a goal for this project across each ecosystem group including cove forests, considering the lack of young forest conditions in the surrounding landscape.**

The next decade is a critical time for the health of our region's forests and wildlife. RGS/AWS recognizes that poor quality habitat and climate change pose threats to the survival of ruffed grouse in the Central and Southern Appalachians and nationally. Abundant and sustained grouse populations in the National Forests are critical for maintaining a vital link to the outdoors that sportsmen and women share and to perpetuate a conservation ethic in the region, not to mention the wildlife heritage and cultural importance of this forest bellwether. The restoration of our forests is not just a priority for sportsmen and sportswomen regarding hunting, it's also vital for the survival of grouse, woodcock, and all forest wildlife as a component of the Forests' overall biodiversity. 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

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