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September 5, 2024

Jessie Howard, Project Coordinator
USDA Forest Service
Attn: Red Spruce Restoration Project

Re: Red Spruce Restoration Project

Dear Ms. Howard:

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 Red Spruce Restoration Project. This multi-Forest collaboration is an exciting opportunity for the region to expand a drastically needed restoration effort across the Cherokee National Forest, George Washington and Jefferson National Forests, Monongahela National Forest, and the National Forests in North Carolina.

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." The species is identified as a Species of Greatest Conservation Need in several State Wildlife Action Plans across the Southern Appalachians.

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 the southern Appalachians before it is too late.

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RGS & AWS is very supportive of the Red Spruce Restoration Project as it seeks to restore a critical ecosystem and reestablish a once prominent forest type in the region. High-elevation spruce-fir forest types hold grouse populations. Restoring these high-elevation areas is important for creating desirable forest conditions and improving wildlife habitat for a number of species, as mentioned in the scoping notice (USDA – Forest Service 2024).

We support the scoping notice’s effort to craft a multi-faceted approach to spruce restoration. Planting efforts and release scenarios will prove to be useful to give restoration professionals a range of tools to implement this work. Underplanting in hardwood forests, planting in old fields or previously mined lands, and planting in riparian and floodplain corridors will offer significant benefits. Additionally, release methods will help accelerate regeneration and increase structural complexity (USDA – Forest Service, 2024). We know that grouse tend to occupy areas with young forest from natural disturbance events or from timber harvests. We encourage the Forest Service to continue to examine sustainable forest management options, in addition to planting efforts, to increase the pace and scale of young forest creation in some of these areas when working on the environmental assessment (EA).

Ultimately, we know that a lot of work has gone into this initiative, including the efforts of the Red Spruce Technical Advisory Board (RSTAB). The recommendations of this group should certainly be considered in the next phase of evaluation. We look forward to continuing to be engaged in conversations and working with the Forest Service and partners on this important regional initiative.

We appreciate the opportunity to comment and express our support for this project.

Sincerely,

Sean Barry

Sean Barry, Forest Conservation Coordinator

Southern Appalachian Region

Ruffed Grouse Society & American Woodcock Society

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