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December 19, 2025

Troy Waskey
District Ranger
Nantahala Ranger District
Nantahala National Forest
90 Sloan Road
Franklin, NC 28734

Re: Northside Restoration Project Draft EA Comments

To District Ranger Troy Waskey:

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 *Northside Restoration Project Draft Environmental Assessment (EA)* on the Nantahala Ranger District of the Nantahala National Forest.

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. The report identified that, "loss of young forests across the landscape is the primary driver of this decline" (Eastern Grouse Working Group, 2020, p. 1). The species is identified as a Species of Greatest Conservation Need in North Carolina's State Wildlife Action Plan (NCWRC, 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 at least 8-12% young forest (0-20 years old) is optimal for bird diversity in Southern Appalachian forests, including many “young forest obligates” and “mature forest obligates” (Jacobs & Warburton, 2016). For ruffed grouse in particular, it is essential that vegetation management projects on the Nantahala National Forest work to create a pathway to maintain early successional habitat at a maximum level possible within the confines of the Nantahala and Pisgah National Forests Land Management Plan (LMP). On a landscape scale, achieving a biologically significant interspersed of young forest in balance with middle-aged, open woodland, mature, and late-successional forest conditions, is critical to the survival of forest wildlife dependent on diverse forest conditions.

According to the draft EA, the Great Balsam Geographic Area (GBGA) currently contains just 1% young forest conditions (see Figure 3.2.1). The overwhelming majority of stand conditions fall within the 80-110 year old age classification. These closed canopy mature forests are fine for generalist wildlife species, but they lack many of the characteristics necessary for a diversity of wildlife species. For this reason, the need for this project is highly justified as it will create better conditions for wildlife species that are dependent on diverse forest conditions, especially in high elevation areas. This includes achieving objective GB-GLS-06 in the LMP: “Enhance structural conditions for ruffed grouse, deer, and turkey by providing more young forest” (USDA-Forest Service, 2023). Furthermore, with the exception of units 7-18 and 7-21, all proposed action stands fall within the Grouse Wildlife Habitat Active Management Area (WHAMA) (USDA-Forest Service 2025, 7).

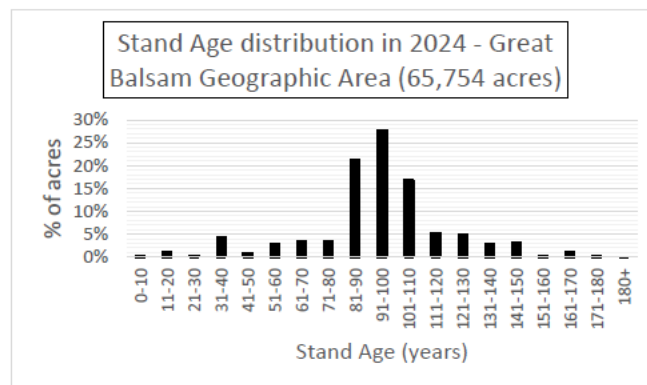


Figure 3.2.1 – Stand age class distributions of Forest Service acres in the Great Balsam Geographic Area, based on 2024 FSVeg database information

RGS & AWS strongly supports the Alternative B proposed action outlined in the Northside Restoration Project Draft EA as it will create forest structural and age class diversity that aligns closer with desired forest conditions. The 2,274 acre of vegetation management objectives (see table 2.21) outlined in the proposed action including 366 acres of commercial young forest creation, 22 acres of commercial thinning, 354 acres of non-commercial forest stand improvement, 1,375 acres of prescribed burning, 106 acres of non-commercial thinning to restore dry oak woodlands, and 51 acres of wildlife opening maintenance will improve wildlife habitat and forest health (USDA-Forest Service 2025, 10).

Table 2.2.1 – Acres of proposed actions by LMP Objective, Management Area (Matrix and Special Interest Areas), and associated ecosystem characteristics restored. *
Indicates use of timber sale for implementation.

LMP OBJECTIVE	Proposed Action	MA	Characteristic(s)	Acres
INTERMEDIATE THINNING (ECO-O-4)	Commercial Thin *	Matrix	Composition	22
OPEN WOODLAND THIN (ECO-O-05)	Oak Woodland Thin	Matrix	Structure	106
PRESCRIBED FIRE (ECO-O-06)	Rx Burn	Matrix/SIA	Structure & Composition	1375
STAND IMPROVEMENT (ECO-O-03)	Crown Touch Release	Matrix	Structure & Composition	47
	Fir Plantation Thin	SIA	Structure	4
	Midstory Removal	Matrix	Composition	174
	Competition Control	Matrix	Composition	5
	Spruce Release	Matrix/SIA	Composition	75
	White Pine Plantation Thin	Matrix	Composition	49
	Total			354
YOUNG FOREST CREATION (ECO-O-02)	White Pine Clearcut *	Matrix	Structure & Composition	74
	Irregular Shelterwood Removal *	Matrix	Structure & Composition	153
	Full Shelterwood Removal (w/ reserves) *	Matrix	Structure & Composition	139
	Total			366
WILDLIFE OPENINGS MANAGEMENT (ECO-O-01)	Improve Existing Wildlife Fields	Matrix	Structure	51
Grand Total				2274

When it comes to the details of the project, we believe the following information should be considered:

Prescribed Fire

We are pleased to see prescribed fire as a major component of this project. Low intensity fire can be very beneficial for ruffed grouse and a number of other wildlife species, especially when implemented to create a habitat mosaic (Harper et al., n.d., p. 15). It is also exciting to see that silvicultural treatments will be combined with prescribed fire to maximize benefits (USDA-Forest Service, 2025, p. 12). Another consideration, especially for oak regeneration, is timing of fire. In the mountains, burn windows are often limited. However, some results have shown that growing season fires in stands treated with shelterwood with reserves can positively promote oak regeneration. One study found that red oak regeneration was strongest during late growing season burns, whereas white oak regeneration was similar for early growing season and late growing season burns. However, additional stand tending will likely still be necessary in subsequent years to get desired outcomes and control competitive species (Turner et al., 2025).

Timber Harvest

Timber harvests are an excellent management tool for creating young forest within the project area. It is encouraging to see the shelterwood method as an option for this project. Shelterwood harvests leave beneficial residual trees for wildlife and can help establish advance oak regeneration. In sites with desired conditions for oak regeneration and recruitment, mature oaks should be retained as residual trees to provide a hard mast food source in the years ahead (Harper et al., n.d. p. 9). Clearcutting the white pine plantation in the project area and returning it to an oak/hardwood dominated stand will also be beneficial. Clearcutting is an acceptable management tool as it can provide the light conditions necessary for rapid regeneration and high stem density, creating high quality habitat for various needs and life stages of wildlife. This includes brood rearing and escape cover for ruffed grouse (Harper et al., n.d. pp. 3-5). Interspersion and juxtaposition of habitats is perhaps the most critical factor in forest management to benefit ruffed grouse. For this reason, harvest units should be relatively close together and should not exceed 40 acres. In fact, much smaller units are usually beneficial for grouse (<25 acres) (Harper et al., n.d. pp. 36-37). It's exciting to see that many units in the project area fall within this size class. With any disturbance, we recognize the importance of invasive species control. Invasives should be chemically treated along roads and near or in harvest units before and following harvest activities. Additionally, we are in full agreement with the commitment to adhere to "the North Carolina Forest Practices Guidelines Related to Water Quality (NC FPGs or latest), and North Carolina and National Core Best Management Practices (BMPs)" (USDA-Forest Service, 2025, p. 45).

Forest Stand Improvement

It is nice to see a combination of planned forest stand improvement strategies within the project area. This includes thinning, crown touch release (CTR), and midstory removal. These various methods will enhance stand conditions. This is especially true for CTR and midstory removal. CTR is vital for releasing species of high wildlife value like oak and hickory. Additional consideration could be given to soft mast producing species as well such as black cherry if the site is appropriate. We are also highly supportive of small irregular shaped canopy gaps in more mesic areas to increase structural diversity. We suggest increasing the maximum size of these gaps from 1/8 to 1/2-acre to add additional flexibility for gap design. This combination of CTR and canopy gap formation

can be beneficial to a number of avian species (Hagenbuch 2023). Midstory removal can be a critical step in establishing advance oak regeneration and prepping the stand for a future harvest.

Wildlife Opening Maintenance

It is great to see the emphasis on edge habitat around wildlife openings in the project area. Removing woody stems roughly 35 feet around existing openings will create excellent transitional habitat and reset succession (USDA-Forest Service 2025, p. 17). Native grasses and especially forbs should be promoted in openings relying on the existing seedbank (see example in Harper et al., n.d. pp. 27-32). If planting is necessary, having a proper mixture of grasses, forbs, and legumes will have the most wildlife value. The addition of planting apple trees in openings is also a strong idea. Other tree and shrub species to consider are persimmon and hawthorn.

RGS & AWS commends the Forest Service for their efforts to restore young forest in high elevation areas of western North Carolina. We are fully supportive of the proposed action outlined in the Northside Restoration Project Draft EA and look forward to seeing the project implemented. Thank you again for the opportunity to comment.

Sincerely,



Sean Barry, Forest Conservation Director
Ruffed Grouse Society & American Woodcock Society
Southern Appalachian Region

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