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First name: Nick

Last name: Biemiller

Organization: Ruffed Grouse Society and American Woodcock Society

Title: Southern Appalachian Forest Conservation Director

Comments: Greetings,

Attached are public comments from the Ruffed Grouse Society and American Woodcock Society.

Regards,

Nick

LETTER TEXT:

To District Ranger Barry Garten,

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 Ewing Mountain Vegetation Project #44665 on the Mount Rogers National Recreation Area of the George Washington and Jefferson National Forests.

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, ruffed grouse populations have declined 71% over the past 30 years in the Southern Appalachians. The Virginia Department of Wildlife Resources' 2014-15 Ruffed Grouse Status Summary report showed that ruffed grouse in Virginia have declined at an average annual rate of about 3% over the past several decades. This is mostly the result of a lack of habitat structural diversity and biologically significant levels of young forests (forests age structures of 5 to 20 years).

The Final Environmental Impact Statement (FEIS) for the Revised Land and Resource Management Plan (Forest Plan) of the Jefferson National Forest (the Forest) stated the following cumulative effects to ruffed grouse: [“Habitats that benefit grouse and many other early successional species are currently in short supply across the Southern Appalachian Ecoregion... The trend appears to be further declines for this habitat in the future[...] Current supplies of quality grouse hunting areas do not meet the present demands of grouse hunters. This demand is likely to remain stable or increase over the next 10 years. Grouse numbers should increase slightly on Jefferson NF lands in the vicinity of habitat improvements such as management prescription 8E1 lands. Other areas will likely remain low in numbers because these habitats will not meet the special requirements of grouse. Therefore, the slight increases in grouse numbers expected under this plan will not be sufficient to meet the demands of grouse hunters in the future.”] RGS & AWS is concerned about these findings and the inability of most Management Prescriptions on the Forest to meet the habitat needs for ruffed grouse and many other forest wildlife.

The Ruffed Grouse and Woodcock Habitat Emphasis Management Prescription (8E1) of the Forest Plan has objectives to:

- * 8E1-OBJ1: Maintain a minimum of 10 percent of the prescription area in early successional forest habitat conditions (stand age less than 10 years, openings 5 acres in size and greater).
- * 8E1-OBJ2: Maintain a minimum of 10 percent of the area in late-successional to old growth forest conditions greater than 100 years of age.
- * 8E1-OBJ3: Maintain up to 2 percent of the riparian corridor (Management Prescription 11 located within Management Prescription 8E1) in early successional forest habitat conditions in openings 2 to 5 acres in size.
- * 8E1-OBJ3: Maintain an open road density at or below 1.5 miles per square mile (applies to National Forest System roads only).

In addition to the objectives for Management Prescription 8E1 to maintain at least 10 percent early successional habitat, the Forest Plan describes desired conditions for this Management Prescription to ideally maintain 10-16 percent of the prescription area in dispersed early successional habitat.

The Dispersed Recreation Areas- Suitable Management Prescription (7E2) of the Forest Plan has objectives to:

- * 7E2-OBJ1: Maintain a minimum of 4 percent of the prescription area in early successional forest habitat conditions (stand age less than 10 years, openings 2 acre in size and greater).

The Environmental Assessment for the Ewing Mountain Project identified that proposed actions would result in the following effects for each Forest Plan objective:

- * 8E1-OBJ1: 8.3 percent early successional habitat
- * 8E1-OBJ2: 57.7 percent late-successional to old growth forest conditions
- * 8E1-OBJ4: 1.18 miles per square mile of open roads
- * 7E2-OBJ1: 2 percent early successional habitat

Overall, RGS & AWS supports the project concept but encourages the Forest Service to consider the following recommendations to ensure that the Ewing Mountain project is meaningfully contributing towards Forest-wide Objectives from the Forest Plan:

- * Increase early successional habitat creation to at least 4 percent of the 7E2 Management Prescription area.
- * Increase early successional habitat creation to 10-16 percent of the 8E1 Management Prescription area.

The current proposed actions will result in an overrepresentation of late-successional to old growth conditions and an underrepresentation of early successional habitat conditions, as established as Objectives in the Forest Plan. To RGS & AWS this is unacceptable given the urgent landscape-scape habitat restoration needs for ruffed grouse, American woodcock, and other forest wildlife. If the Forest Service is not able to at least meet the minimum habitat Objectives from the Forest Plan on the Project-level, we are concerned that it is not going to happen Forest-wide.

Overall, we support the project and the US Forest Service's efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. However, we are concerned by the low targets for ESH in the Forest Plan across the Forest and the negative impacts this will have to grouse, and other at-risk wildlife as identified in the FEIS. The low objectives for ESH Forest-wide emphasizes the need to achieve higher levels of ESH creation on the project-level, especially within the 8E1 Management Prescription.

We appreciate the opportunity to comment.

Sincerely,

Nick Biemiller, Forest Conservation Director

Southern Appalachian Region