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May 27, 2022

USDA Forest Service
ATTN: Jesse Overcash, Project Leader
110 Southpark Drive
Blacksburg, VA, 24060

Re: White Pine Removal Project #62011

To Jesse Overcash,

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 White Pine Removal Project #62011 on the Eastern Divide Ranger District of the George Washington & Jefferson National Forests.

Established in 1961, the Ruffed Grouse Society (RGS) is a nonprofit 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' 2020 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' 2014-2015 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 forest (forests age structures of 5 to 20 years).

The Final Environmental Impact Statement (FEIS) for the Revised Land and Resources Management Plan (Forest Plan) of the Jefferson National Forest (the Forest) states the following cumulative effects to ruffed grouse: "Habitat 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 the habitat in the future. . . Current suppliers of quality grouse hunting areas do not meet the present demands of grouse hunters. The demand is like 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 are 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.

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The White Pine Removal Project will help the situation by increasing forest age class diversity in the project area and removing uncharacteristic white pine to restore mast producing species (i.e., oak) that are more favorable to grouse and other wildlife. However, even if all stands included in the scoping letter are treated, this project is only a drop in the bucket towards meeting Forest Plan goals for forest age class diversity (see table below). We recommend that the Forest Service maximize early successional habitat creation to the extent possible within the parameters of the project, the main goal of which we acknowledge is to restore off site white pine stands to a more natural species composition.

Prescription (Rx)AreaStated Effect from Scoping LetterEarly Seral Objective
(Forest Plan)TreatmentTotalRegen Harvest as % of Rx Area
Regen
harvestComm. ThinComm. Thin WP removal
8A1. Mix of Successional HabitatsMove towards 4-10 % early successional4-10%184 ac171 ac56 ac411 ac0.365%
7B. Scenic CorridorsReplace monoculture with more diversityup to 4%0 ac22 ac0 ac22 ac0%
9A1. Source Water ProtectionAdd up to 2% of early successional habitat to the existing 2%up to 4%138 ac251 ac492 ac881 ac0.72%
8E1. Ruffed Grouse/ Woodcock HabitatIncrease existing acreage of early successional10-16%156 ac0 ac0 ac156 ac0.969%
totals:478 ac444 ac548 ac1470 ac

RGS & AWS support the project and offer the following suggestions to ensure that the project meets its goal of improving forest resilience, increasing species and structural diversity, and providing high quality habitat:

1) Grapevines should be retained, when possible, especially in the 8E1 prescription areas. Grapes are a very important food source for grouse and other game and nongame species, and the vines also provide excellent cover for grouse. Because the vines can deform, suppress, and kill crop trees, it is understood that there will have to be a balance between providing this important habitat feature and protecting timber values.

2) Grouse drumming logs should be retained or recruited. Logs at least ten inches in diameter and ten feet long located on upper slopes and ridgetops or above logging roads have been found to be preferred by grouse in the Appalachians. Standard 8E1-003 from the Forest Plan calls for "an average of one large (>12" d.b.h.) down trees per acre as drumming logs."

3) The scoping letters states that "Post-harvest treatments would include mechanical control of non-desirable white pine and some deciduous species of low vigor in the understory, chemical treatment of undesirable species and non-native invasive species (NNIS), supplemental planting of superior oaks and shortleaf pine seedlings, and limited prescribed burning to encourage oak development." We believe there is alignment between efforts to establish and recruit oak trees and promote high-quality young forest habitat. We support the use of prescribed fire as a tool to establish oak regeneration and encourage the Forest Service to implement post-harvest burning as a tool, as well as to increase soft mast producing plans and boost invertebrate populations. Once oak is established, we encourage the Forest Service to implement a fire-free period to allow oak recruitment and to provide the high woody stem density, young forest habitat, that ruffed grouse depend upon, while also encouraging the development of high-quality crop trees.

In addition, we suggest analyzing the proposed action and alternatives as a larger analysis area at the watershed level in the EA. In other words, the EA should assess the quantity of early successional habitat created as a percentage of the total project area and management prescription areas within the project. This will allow a better understanding of how the management prescriptions will contribute to the quantity, juxtaposition, and

interspersion of habitat types and progress towards Forest Plan objectives on a functional scale, and how the project contributes towards Forest-wide objectives for desired habitat conditions.

We appreciate the opportunity to comment.

Sincerely,

Nick Biemiller, Forest Conservation Director
Southern Appalachian Region