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Title: Southern Appalachian Forest Conservation Director

Comments: Re: Crossover Project #56347 Comments

To Whom it May Concern:

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS & AWS) and our members, I thank you for the opportunity to comment to the Crossover Project #56347 for 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 (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 North Carolina's State Wildlife Action Plan (North Carolina Wildlife Resources Commission, 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 maintaining 8-14% early successional habitat across the Nantahala and Pisgah National Forests would optimize for bird diversity, including "young forest obligates" and "mature forest obligates" (Jacobs & Warburton, 2016). We recognize that these forests are not managed solely for bird diversity and that many other interests must be considered in a multiple use forest. However, to ensure viable wildlife populations are maintained long-term, it is essential that the Forest Plan establishes a pathway to maintain early successional habitat conditions somewhere within the 8-14% range.

RGS & AWS support the intent of the Crossover Project and believe that the project will benefit forest wildlife and make a meaningful contribution towards achieving Forest-wide desired conditions. Currently, the silvicultural treatments proposed as timber harvests will result in 8.5 percent young forests in the project's analysis area, which is a step in the right direction.

We understand that there is not strong consensus among all stakeholders to implement commercial timber harvests in characteristic vegetation in the Ash Cove Wilderness Inventory Area and older forests in the southern 2/3rds of Unit 53/23 and the 16 acres of Unit 86/24. We hope that site-specific conversations in these areas can avoid conflict and allow the project to move forward.

RGS & AWS commend the Forest Service on their efforts to implement commercial timber harvests at biologically significant scales. We are excited about seeing the project move forward and thank you again for the opportunity to comment.

Sincerely,

Nick Biemiller, Forest Conservation Director  
Southern Appalachian Region  
Ruffed Grouse Society & American Woodcock Society

For more information visit the RGS & AWS website at [RuffedGrouseSociety.org](http://RuffedGrouseSociety.org).  
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