Data Submitted (UTC 11): 10/22/2019 4:00:00 AM
First name: Linda
Last name: Ordiway
Organization: Ruffed Grouse Society
Title: Regional Biologist
Comments: I appeciate the opportunity to provide comments on the direction of management of our public lands. The management activities in alternative 1 are supported by the Ruffed Grouse Society (RGS). The actions taken can be considered both proactive and reactive in design. The identified voids within timber ageclasses, noted decline of wildlife populations, and increasing presence of non-native and (or) invasive species, and lack of native floral biodiversity throughout the entire region is not a recent occurrence. It is in most cases the result of lack of management, historic suppression, and or ecological disturbance of any kind and at any scale.

Forest ecosystems are dynamic in nature, and succession is a part of that fluidity. Identifying areas where repetitive management is proposed without multidisciplanary ground evaluation to determine if objectives of initial treatments have been met is fighting the natural succession process. The objectives for treatment outcome need to be clearly stated and flexibility available in adjusting any [lsquo]repetitive[rsquo] treatments depending on the vegetative response. If for instance a burn establishes desirable vegetative response that can, if not reburned, progress to a young forest stand wildlife and timber value), pole stand and eventually a mature timber stand and beyond to older growth stand characteristics why reburn on a rather set rotation of 3-7 yrs.? Another example is designating a stand (multiple stands within a project area) as young regenerating forest habitat in perpeturity. This type of habitat should be the result of implimenting a silviculture system across the landscape. Repeat entry to set back a stand(s) many times is diminishing the benefits these stands provide in full life cycle management of all wildlife. Evaluation of the regeneration and herbaceous response should determine the next treatment or progression to pole and beyond.

Utilizing the adaptive management strategy in the truest sense of the definition is a necessity. Therefore it is essential that burn blocks, designated open woodland stands and young forest stand designations not be conditions designated in perpetuity.

Figure 3 illustrates why we cannot continue to recut older pole stands to create the young regenerating forest age class. In doing so you are not moving the belly of the snake to fill the void and supress the amount of the older age classes. All actions need to be progressing in filling the void of the 50-80 yr class to progress in both size and characteristics of older growth stands as these stands begin to decline from the climax forest structure.

MA-13 equals about 65% of the project area. It would be useful in knowing what the accurate percentage or acreage of this MA is available for timber harvest due to within site limiting factors.

It is stated that 76% of the stands are > 100 years of age. Optimal mast production is diminished in stands of 40-100 years of age is also stated. I would argue the age is more likely 80-100 years based on personal experience, but regardless this notation emphasizes the need for management within these stands to procure optimal and continual mast availability for restocking and necessary resources for wildlife.

The complex structure referred to within the Cove Forest Type should not deter management efforts. Utilizing a 2 age silviculture system will maintain the structural complexity and integrety of the Cove forests. Identifying areas based on forest health and regeneration potential for desired species would be key in deliniating group selection possibililties. Site limiting factors my make commercial harvests tricky but in terms of maintaining the structural integrity of this important forest type non-commercial felling should be an option. These richer sites host a more diverse suit of wildlife species including residents, breeding, and migratory songbird populations.

On Page 22 regarding permanent opening definition and classification these should not be considered as early successional habitat. There is nothing successional about these. The structure and design in maintaining these

openings does not permit the natural successional process. It retards it and these should be referred to as grass lands or keep the designation of permanent openings but do not include in young regenerating forests or early successional habitat. To increase the benefit of these openings to all wildlife I would suggest to incorporate cut back borders around all disturbance. Utilizing a band of thinnings varying in width based on topographic features will provide a transition zone of true early successional habitat and or young regenerating forests which provide escape cover, food resources and nesting habitat for those birds using shrubby vegetation or more dispersed / clumpy ground cover.

The mention of these openings being used by American woodcock is rather misleading. Woodcock will only use these areas when appropriate nesting/feeding habitat is spatially available. Roosting sites are more beneficial with a clumping vegetative structure usually not provided when the ground is comprised of thick sod and fescue. Disking these areas may assist in providing that clumped vegestative structure. The USFS would need to evaluate if these areas need supplemental seeding or vegetative control treatment based on passed knowledge and presence of non-native vegetation to return. It has been my experience in parts of WV that following discing there was a good response of native vegetation that out competed but not eliminated the non-native troublesome species.

As a side note on page 54 I believe you meant to include vegetative treatments as mechanical, thermal and chemical rather than listing mechanical twice.

Thank you for the opportunity to work with the USFS in commenting and developing this proprosed project. Incorporating the knowledge and skills over the varying disciplines within the forest personell is key is successful and beneficial ground implementation. Being creative in incorporating the how[rsquo]s and why[rsquo]s during implemention to achieve the desired goal of maintaining forest resiliency, integrity and increasing the amount and quality of habitats currently deficient on not only this forest but region wide is progressive in management and should be applauded. With the recent publications in Science and from the National Audubon Society regarding disappearing bird numbers you (USFS) as the front lines in management to make a difference should be excited about the opportunity to show how the GW and Jeff is committed to turning the ship. Continued involvement of the many stakeholders in transferring this message to the public and in the development of this and future landscape scale projects is essential to success and making a difference in keeping common birds and all flora and fauna common.

We all have the equal right to enjoy what our forests have to offer whether it is old growth solitude, Eastern towhees, pollinators, hermit thrushes or various salamanders. Ironically disturbance ecolgy is the pathway managers need to help in ensuring these forest characteriscts and species are available to future generations of forest users from all walks of life.

Feel free to contact me for any necessary clarification or further discussion pertaining to the above documentation. I look forward to continued engagement in the development of new and the implementaion of this project.

Professionally

Linda D. Ordiway PhD

Regional Biologist

Ruffed Grouse Society