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Comments: The Rocky Mountain Elk Foundation (RMEF) Virginia State Leadership Team (there are 3,500 RMEF members in Virginia) strongly supports the proposed Potts Creek Vegetation Management Project. This landscape scale project will augment the Lower Cowpasture efforts and benefit the District, forest, wildlife and a variety of forest users. The project includes numerous components which achieve the George Washington National Forest Forest Plan intent.

The proposed Potts Creek Project Vegetation Management Project will help restore badly needed age-class, structure and wildlife habitat diversity. Scoping Letter Table 8 points clearly to the need for active forest management to restore critical structure and habitat in the project area. The RMEF Virginia State Leadership Team strongly endorses the proposed prescribed burns and commercial timber harvests and other active management. We are particularity pleased to see the proposed ~500 acreage for early successional, regenerating young forests. Further, an age-class diverse forest with attending canopy structural diversity will help mitigate climate change.*

Annually, about 62,000 people purchase a National Forest permit ($4.00) for individual use to hunt on the George Washington and Jefferson National Forests (GWJEFF) which comprises about 2/3s of Virginia's public hunting acreage. These hunters and other forest users have expectations for a mosaic of quality habitat across the GWJEFF. The Rocky Mountain Elk Foundation's Virginia State Leadership Team strongly supports a GWJEFF habitat mosaic that includes mature growth of varying ages, understory structure and canopy conditions in accord with current Forest Plans. To assure forest resilience and health, we support active forest management to create regenerating young forests, a critical component of a complete forest mosaic.

Absent historic (natural) disturbance such as wildfire and Pre-Columbian human set fire**, we need sustainable, ongoing, active forest management to create and maintain a healthy and resilient forest to include regenerating young forests. The 1.8 million GWJEFF acres allows other management options to support a wide variety of wildlife species (including a variety of migratory and resident birds), to serve a wide variety of users, and to meet other ecological needs.

Each year of the past decade we lost an average of 2,600 acres of critical young forest structure (0-20 year old trees) and associated wildlife habitat on our (GWJEFF). As young forests age out, we lose critical wildlife habitat all along the Central and Southern Appalachians. This loss contributes to a serious and ongoing population decline in game and non-game species (Ruffed Grouse and Golden-winged Warbler as two examples). Hundreds of wildlife species depend on young forest habitat (thickets) for protection, breeding, rearing and food.

Timber harvests and other active management will do more than assure wildlife habitat. These treatments can help restore a variety of age-classes, forest structure and wildlife species. An examination of the desired conditions relative to age-class and current conditions demonstrates by District the overall lack of 0-10 and 0-20 year old forest growth. In 2019, the GWJEFF, overall, consisted of less than one-percent (0.6%) regenerating young forest (down from 1.1% in the prior year) while Forest Plans recommend a maximum of 7%. Sustainable commercial timber harvests (clear cut and shelterwood) present the most productive way to create 10 to 40 acre patches of this critical habitat. Ten acres is likely the minimum meaningful size of young forests to support Ruffed Grouse***. Proposed regeneration harvests but one (6 a.) fit within the range.
Young forest structure complements an existing core of mature forest and helps assure a diverse GWJEFF for future generations. This project will offer a great public education opportunity to help folks understand what actually constitutes a forest; and, the management required to maintain it.

Thanks for the opportunity to comment and please keep us in the loop.

*High rates of primary production in structurally complex forests, Gough, et al., 2019, Ecology 100(10):e02864. 10.1002/ecy.2864
**Don't Downplay the Role of Indigenous People in Molding the Ecological Landscpe, Abrams, Marc D., Scientific American, August 5, 2020.
***The Ruffed Grouse: Life History, Propogation and Management, Bump, et al., 1947, P. 111. New York Conservation Department. Telegraph Press, Harrisburg, Pennsylvania. Reprinted October 1, 1978 by members of "Grouse Tales".