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Comments: Maximize ESH creation to the extent possible within the project's parameters, the main goal of which we acknowledge is to restore off-site white pine stands to a more natural species composition.
Utilize treatments that will create functional ESH for wildlife species and regenerate hardwood and yellow pine tree species. This means moving stands that are currently proposed as "Free Thinning" and "Variable Retention Thinning" treatments to "Thinning with Patch Clearcuts" or "Stand Type Conversion Harvest." For stands with a higher portion of hardwood trees in the overstory, consider implementing a shelterwood harvest (overstory removal with reserves) instead of the currently proposed treatments.
Grapevines should be retained, when possible. 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's understood there will have to be a balance between providing this important habitat feature and protecting timber values.
Grouse drumming logs should be retained or recruited in harvest units. Logs at least 10 inches in diameter and 10 feet long located on upper slopes and ridgetops or above logging roads have been found to be preferred by grouse in the Appalachians.
We believe there's alignment between efforts to establish or release 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.