Data Submitted (UTC 11): 5/15/2024 4:00:00 AM
First name: Tristan
Last name: Moorehead
Organization:
Title:
Comments: 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. 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 Kentucky's State Wildlife Action Plan.

Ruffed grouse are a reliable indicator for healthy, diverse forest ecosystems. 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.

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 eastern Kentucky before it is too late.

The best available science suggests that 8-14% young forest habitat (0-20 years old) is optimal for bird diversity in Southern Appalachian forests. For ruffed grouse in particular, the Kentucky Ruffed Grouse and Young Forest Strategic Plan recommends the creation of 15-25% in young forest cover in focal areas. On a landscape scale, achieving a biologically significant interspersion of young forest habitat in balance with middle-aged, open woodland, mature, and late-successional forest conditions, is critical to the survival of all forest wildlife.

Nowhere is this conservation need greater than the Daniel Boone National Forest. According to the Forest's 2021 Biennial Monitoring and Evaluation Report, there's currently only 0.34% young forest conditions across the Forest. However, the Forest Plan itself has objectives of 5-6% young forest in 1.K Habitat Diversity Emphasis Prescription Areas and 8% young forest in Ruffed Grouse Emphasis Prescription Areas. Maintaining a biologically significant amount of young forest on the Daniel Boone National Forest will not only decide the survival of ruffed grouse and many at-risk forest wildlife in the region, but also the sustained opportunity for the public to interact with these species.

According to the Project's proposal letter, a very small percentage of stands across the 5,000-acre project area currently exist in young forest or early successional habitat conditions (5-15-years). To ensure that a biologically significant amount of young forest habitat is created through this project, we encourage the Forest Service to maximize the amount of young forest habitat creation allowed by the Forest Plan. This means creating 8% young forest habitat across the entire 3.H Ruffed Grouse Emphasis Prescription Area through even-aged regeneration treatments implemented by commercial timber harvests.

RGS & AWS is fully supportive of the project and commend the Forest Service for their efforts to restore young forest habitat to biologically significant scales. We are excited about seeing the project move forward and thank you again for the opportunity to comment.

Sincerely,

Tristan Moorehead