

Data Submitted (UTC 11): 12/23/2025 9:23:50 PM

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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 ruffed grouse is identified as a Species of Greatest Conservation Need in North Carolina'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 western North Carolina before it's too late.

According to the draft EA, the Great Balsam Geographic Area currently holds just 1% young forest conditions. The overwhelming majority of stand conditions fall within the 80-110-year-old age classification. These closed canopy mature forests are fine for generalist wildlife species, but they lack many of the characteristics necessary for a diversity of wildlife species. In too many stands, fire resistant species of trees have been out competed by faster growing, less fire resistant species of trees increasing the risk larger scale forest fires.

I strongly support the Alternative B proposed action outlined in the Northside Restoration Project Draft EA as it will create forest structure and age class diversity that aligns closer with desired forest conditions.

Wide scale combinations of timber harvests, prescribed fire and other forest stand improvement techniques will greatly enhance wildlife habitat and forest health in the years to come.