



RUFFED GROUSE SOCIETY

Nick Biemiller

Forest Conservation Director

Southern Appalachian Region

nickb@ruffedgrousesociety.org

Mobile: 412-719-0625

Lauren Stull

District Ranger

USDA Forest Service

27 Ranger Lane

Natural Bridge Station, VA 24579

Dear Ms. Stull,

On behalf of the Ruffed Grouse Society & American Woodcock Society (RGS & AWS) and our members, I thank you for the opportunity to comment on the *Bobblets Gap Vegetation Project #58919* on the Glenwood and Pedlar Ranger Districts of the George Washington and Jefferson National Forests.

Established in 1961, the Ruffed Grouse Society (RGS) is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife, and promoting a conservation ethic. Together with the American Woodcock Society (AWS), established in 2014, RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

According to the Virginia Department of Wildlife Resource's 2014-15 Ruffed Grouse Status Summary report, ruffed grouse in Virginia have declined at an average annual rate of about -3% annually over the past several decades (Norman, 2015). This is mostly the result of a lack of habitat structural diversity and biologically significant levels of young forests (5-20 years).

The Final Environmental Impact Statement (FEIS) for the Revised Land and Resource Management Plan (Forest Plan) of the Jefferson National Forest (the Forest) stated the following cumulative effects to ruffed grouse: "Habitats that benefit grouse and many other early successional species are currently in short supply across the Southern Appalachian Ecoregion... The trend appears to be further declines for this habitat in the future... Current supplies of quality grouse hunting areas do not meet the present demands of grouse hunters. This demand is likely to remain stable or increase over the next 10 years. Grouse numbers should increase slightly on Jefferson NF lands in the vicinity of habitat improvements such as management prescription 8E1 lands. Other areas will likely remain low in numbers because these habitats will not meet the special requirements of grouse. **Therefore, the slight increases in grouse numbers expected under this plan will not be sufficient to meet the demands of grouse hunters in the future.**" To RGS & AWS, this is unacceptable.

RGS & AWS is concerned about these findings and the inability of most prescription areas on the Forest to meet the habitat needs for ruffed grouse and many other forest wildlife. RGS & AWS provided comments on November 2, 2020 to this project. We overall supported the project concept but recommended for the Forest Service to **increase early successional habitat (ESH) creation to 10 percent of the 7E2 prescription area and 4 percent of the 7F prescription are to meet goals and objectives from the 2004 Revised Land and Resource Management Plan for the Jefferson National Forest (Forest Plan).** In response to our comments, the Forest Service stated that, "Factors such as existing road access, slope, old growth, riparian areas, and visual concerns limit areas which can be managed."

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Ruffed Grouse Society

American Woodcock Society

451 McCormick Road

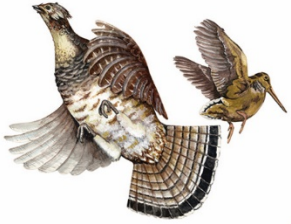
Coraopolis, PA 15108

412-262-4044

Toll Free 888-564-6747

Fax 412-262-9207

RuffedGrouseSociety.org



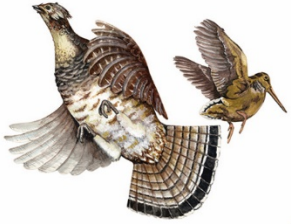
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RGS & AWS appreciate the Forest Service's response and for the clarification on the limiting factors to forest management in the project area. We understand that there are project-specific barriers to forest management and that achieving desired conditions from the Forest Plan might not be feasible everywhere. However, the limiting factors identified for this project area are common across the Southern Appalachians and some of them might have the potential to be mitigated or overcome. We are very concerned by the Forest-wide trends for ruffed grouse identified in the FEIS. If the Forest Service is unable to achieve desired habitat conditions in this project area, will they be able to elsewhere?

Please consider our specific comments below:

- The Bobblets Gap Vegetation Project Environmental Assessment analyzed effects of the project on Management Indicator Species but did not assess effects to ruffed grouse populations. Ruffed grouse is not included as a Management Indicator Species in the Forest Plan; however, the lack of biologically significant levels of ESH has the potential to negatively impact ruffed grouse populations in the project area, as stated in the Forest Plan's FEIS. The Ruffed Grouse and Woodcock Habitat Emphasis (8E1) prescription area from the Forest Plan is only allocated across 2 percent of the Forest. As such, the effects on ruffed grouse populations should be considered across a broader suite of prescription areas. **RGS & AWS would like the Forest Service to consider the effects of the project on ruffed grouse populations.**
- The lack of ESH in the project area (0 percent) was identified by the Forest Service as the primary purpose of this project. However, ESH will only be created across 2-3 percent of the project area. The Blue Ridge Parkway Visitor Corridor (7F) prescription has an objective for up to 4 percent ESH creation and the Dispersed Recreation Area (7E2) prescription area has an objective for 4-10 percent ESH creation. The Forest Plan states prescription area 7E2 should, "Maintain a *minimum* of 4 percent of the prescription area in early successional forest habitat conditions." **RGS & AWS would like the Forest Service to consider innovative methods to overcome some of the limiting factors identified in their response to achieve desired habitat conditions.** This could include utilizing skyline cable logging on steeper slopes, strategically placing harvest units where they will not negatively impact viewsheds, or creating new roads to access forest stands that are currently inaccessible. **The project should at least meet the 4 percent objectives from their Forest Plan for prescription 7E2.** However, we would prefer to see ESH creation at levels on the higher end of what the prescription areas allow, including 4 percent for 7F and 10 percent for 7E2.
- **Consider opportunities for interpretive signage along trails where active forest management will be implemented.** Rather than "hiding" timber harvesting from the trails, consider implementing forestry treatments close to some trail sections and use these areas as an opportunity to educate the public on the role of active forest management to achieve forest restoration and wildlife habitat goals. RGS & AWS would be very interested in collaborating in these efforts.

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Overall, we support the project and the Forest's efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. However, we are concerned by the low targets for ESH in the Forest Plan across the Forest and the negative impacts this will have to grouse, and other at-risk wildlife as identified in the FEIS. The low objectives for ESH Forest-wide emphasizes the need to achieve higher levels of ESH creation on the project-level.

We appreciate the opportunity to comment.

Sincerely,

Nick Biemiller, Forest Conservation Director
Southern Appalachian Region

