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USDA Forest Service
ATTN: Joe Elliott, Project Leader
1700 Park Ave, SW
Norton, VA 24273

Re: Devils Hens Nest Vegetation Project

To Project Leader Joe Elliott

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 *Devils Hens Nest Vegetation Project* on the Clinch Ranger District 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 Association of Fish and Wildlife Agencies' Eastern Grouse Working Group report, ruffed grouse populations have declined 71% over the past 30 years in the Southern Appalachians. The Virginia Department of Wildlife Resource's 2014-15 Ruffed Grouse Status Summary report showed that ruffed grouse in Virginia have declined at an average annual rate of about 3% over the past several decades. This is mostly the result of a lack of habitat structural diversity and biologically significant levels of young forests (forests age structures of 5 to 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.**" RGS & AWS is concerned about these findings and the inability of most Management Prescriptions on the Forest to meet the habitat needs for ruffed grouse and many other forest wildlife.

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The *High Quality Forest Products* Prescription (10B) of the Forest Plan has the following Standards:

- 10B-005: 10-16 percent of the prescription area consists of a dispersed system of transitory openings created through forest management activities.
- 10B-011: Regeneration units range from 5 to 40 acres in size.
- 10B-012: Regeneration harvest areas may occupy up to 20 percent of a project analysis area in order to provide 10-16 percent of an individual contiguous management prescription area in early successional forest habitat conditions.

In addition to the Standards for Management Prescription 10B to maintain 10-16 percent early successional habitat, the Forest Plan describes the *Desired Future Condition* for this Management Prescription as, “Early-successional forest patches created by management actions may occur in patches of 2 to 40 acres, and may be clustered or scattered across the landscape”.

The *Mix of Successional Habitats in Forested Landscapes* Prescription (8A1) of the Forest Plan has Standards and Objectives to:

- 8A1-OBJ1: Maintain a minimum of sixty percent of the area greater than 40 years of age.
- 8A1-OBJ2: Maintain a minimum of twenty percent of the area in late-successional to old growth forest conditions greater than 100 years of age.
- 7E2-OBJ1: Maintain a minimum of 4 percent of the prescription area in early successional forest habitat conditions (stand age less than 10 years, openings 2 acre in size and greater).
- 8A1-001: Limit creation of early-successional forest habitat to 10 percent of forested acres (based on the contiguous prescription area).
- 8A1-010: Regeneration harvest areas range in size from 2 to 40 acres.
- 8A1-013: Regeneration harvest areas may occupy up to 16 percent of a project analysis area in order to provide 4-10 percent of an individual contiguous management prescription area in early successional forest habitat conditions and to cluster these conditions on the landscape.

In addition to the Standards and Objectives for Management Prescription 8A1, the Forest Plan describes the *Desired Future Condition* for this Management Prescriptions as, “Early successional habitat in the 2100 to 2500 foot elevation range for species like golden-winger warbler, is abundant in the form of open woodlands, regenerating forests, old fields, balds, and utility rights-of-way”.

RGS & AWS strongly supports the project and the Forest Service’s efforts to increase the pace and scale of active forest management to benefit healthy forests and abundant wildlife. We encourage the Forest Service to consider implementing regeneration harvests at the higher end of what is described in the Forest Plan’s Standards and Objectives for Management Prescriptions 10B and 8A1 to create early successional forest habitat conditions at biologically significant scales.

Given the concerning Forest-wide findings from FEIS, RGS & AWS recommends the following habitat targets across each Management Prescription for this project:

- **10B: 20 percent early successional forest habitat conditions well-interspersed across the project area with patches ranging from 2 to 40 acres in size.**

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- **8A1: 16 percent early successional forest habitat conditions well-interspersed across the project area with patches ranging from 2 to 40 acres in size.**

If these higher targets for early successional forest habitat conditions are unable to be attained for this Project due to access or merchantability, we recommend that the Forest Service *at least* meet the minimum habitat Standards and Objectives from the Forest Plan for these Management Prescriptions.

We appreciate the opportunity to comment.

Sincerely,



Nick Biemiller, Forest Conservation Director

Southern Appalachian Region

For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.