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Comments: Nick BiemillerForest Conservation DirectorSouthern Appalachian RegionRuffed Grouse Society & American Woodcock SocietyMay 15, 2024Timothy ReedDistrict RangerStearns Ranger DistrictDaniel Boone National Forest3320 Highway 27 NWhitley City, KY 42653Re: Jellico Vegetation Management Project Draft EA CommentsTo District Ranger Timothy Reed: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 Jellico Vegetation Management Project Draft Environmental Assessment (EA) on the Stearns Ranger District of the Daniel Boone National Forest.Established in 1961, the Ruffed Grouse Society (RGS) is North America[rsquo]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[rsquo] Eastern Grouse Working Group report in December 2020, ruffed grouse populations have declined 71% since 1989 in the Southern Appalachians. The report identified that, [ldquo]Loss of young forests across the landscape is the primary driver of this decline[rdquo] (Eastern Grouse Working Group, 2020, p. 1). The species is identified as a Species of Greatest Conservation Need in Kentucky[rsquo]s State Wildlife Action Plan (KDFWR, 2023).Ruffed grouse are a reliable indicator for healthy, diverse forest ecosystems (Norman et al., 2004). 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 [ldquo]disturbance-dependent[rdquo] and [ldquo]mature forest obligates[rdquo] that both benefit from a biologically significant mix of young, open, and late-successional forest conditions across the landscape (Bakermans et al., 2011; Golden Winged Warbler Working Group, 2013; Jacobs & Warburton, 2016; Lambert et al., 2017; Wildlife Management Institute, 2008; Wood et al., 2013).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 at least 8-12% young forest habitat (0-20 years old) is optimal for bird diversity in Southern Appalachian forests, including [ldquo]young forest obligates[rdquo] and [ldquo]mature forest obligates[rdquo] (Jacobs & Warburton, 2016). 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 (Danks, 2017, p. 3). To ensure viable wildlife populations are maintained long-term, it is essential that vegetation management projects work to create a pathway to maintain early successional habitat conditions at least within the 8-12% range across the Daniel Boone National Forest. 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[rsquo]s 2021 Biennial Monitoring and Evaluation Report, there is currently only 0.75% young forest conditions across the Forest (USDA - Forest Service, 2024b, p. 7). However, the Forest Plan itself has objectives of 5-6% young forest in Habitat Diversity Emphasis Prescription Areas and 8% young forest in Ruffed Grouse Emphasis Prescription Areas (USDA [ndash] Forest Service, 2004, pp. 3-31 and 3-74). 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 experience these species.According to the draft EA for the Jellico Vegetation Management project, [ldquo]72 percent of the project area is mature forest which typically exhibits a closed canopy with an understory and/or midstory layer[rdquo] (USDA - Forest Service, 2024a, p. 3). Furthermore, according to Figure 1 in the draft EA (see below), there is currently no young forest in the 0-20 year age class and just 554 acres in the 21-30 year age class (USDA [ndash] Forest Service, 2024a, p.4). The project area clearly lacks the necessary forest structural and age class diversity needed by many forest wildlife species including grouse, which thrive in forest stands roughly 5-20 years old (Dessecker et al., 2007).Given that the current forest conditions in the project area provide essentially no viable young forest habitat for grouse and other

wildlife, serious efforts are needed to offset declines in wildlife populations in the region.Over 40 years, the proposed action for the Jellico Vegetation Management Project will create an additional 3,500 acres of young forest habitat on National Forest System (NFS) Lands, resulting in roughly 20% young forest creation across the 16,969 acre project area (NFS lands only). These efforts in the project area will move the Forest closer to desired forest conditions established as objectives in the Forest Plan and benefit forest wildlife (USDA - Forest Service, 2004, p. 3-35). RGS & AWS strongly support the proposed action outlined in the Jellico Vegetation Management Project EA as it will create forest structural and age class diversity that aligns closer with desired forest conditions. The variety of treatments outlined in the proposed action including clearcut (931 acres), two-aged shelterwood harvest (1,805 acres), deferment harvest (2,434 acres), midstory removal (524 acres), and thinning (4,367 acres), will result in a mosaic of forest conditions over time (USDA - Forest Service, 2024a, p. 7). This mosaic is critical for creating a healthier and more resilient forest ecosystem.While the work outlined in the proposed action is vital for forest health and wildlife habitat, appropriate measures must be taken to maximize benefits and minimize risk. Following Kentucky[rsquo]s Logging BMP Field Guide will ensure that adequate resource protection measures are in place, and we trust that the Forest Service and contractors will adopt these BMP guidelines. Further, the evidence clearly shows that when Kentucky[rsquo]s Forestry BMPs are adopted, they are effective at protecting water quality and aquatic biodiversity in eastern Kentucky (Barton et al., 2016).RGS & AWS commends the Forest Service on their efforts to restore young forest habitat at biologically significant scales. We are fully supportive of the proposed action outlined in the Jellico Vegetation Management Project Draft EA. Thank you again for the opportunity to comment.Sincerely,Nick Biemiller, Forest Conservation DirectorSouthern Appalachian RegionFor more information visit the RGS & AWS website at RuffedGrouseSociety.org.Follow us on Facebook and Instagram @RuffedGrouseSociety.