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Mark Herberger

January 22, 2020

West Zone NEPA Coordinator

Forest Service-Huron-Manistee National Forests

412 Red Apple Road

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Mr. Herberger,

The Ruffed Grouse Society/American Woodcock Society (RGS/AWS) appreciate the opportunity to comment on the proposed Zone Aspen Project on the Baldwin-White Cloud and Cadillac-Manistee Ranger Districts of the Huron-Manistee National Forests (HMNF). These comments are generated by a review of the scoping document electronically provided by Mark Herberger on January 7, 2020.

RGS/AWS supports the proposal to manage the aspen forest resource of the West Zone of the HMNF to improve the growth and vigor of aspen stands, achieve age class diversity, significantly improve wildlife habitat and provide a healthier forest ecosystem within the two districts noted above. Mechanically harvesting up to 25,000 acres and manually hand-cutting up to 4,500 acres will have a significant positive impact for early-successional wildlife including ruffed grouse, American woodcock, white-tailed deer, and migratory songbirds. Many of the aspen forests proposed for treatment occur within an American woodcock emphasis area and/or within a ruffed grouse management area, in addition to eastern massasauga rattlesnake management areas and deer wintering areas. The proposed forest management activities will also provide significant recreational opportunities for hunters and non-consumptive users of the forest while also improving or creating closed access trails adjacent to managed areas. Furthermore, this project creates a model to build upon in other National Forest System lands that may significantly impact declining young forest dependent wildlife, bellwethers of forest and ecosystem health.

As noted in the scoping document, approximately 61% of the aspen forest type in the West Zone of the HMNF is either above the expected rotation age class or will move beyond that point in the next 10-20 years. Without substantial and expedited active management of these systems, these aspen stands will likely be lost to conversion of another forest type and undergo encroachment of non-native species. This would go against the rotation age identified within the Forest Plan of 40-60 years.

RGS/AWS has one sole objection as to whether the 40-60 year age class for rotation coupled with the acreage goal of mechanical and manual aspen harvest (totaling 29,500 acres) over a 15-year time period will meet the Forest Plan objectives. To date, the HMNF has fallen short of Forest Plan acreage goals by 84% and has only accomplished 16% of the aspen harvest target.

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The Ruffed Grouse Society/American Woodcock Society have worked with the HMNF and other conservation partners to improve over 6,900 acres of aspen forest and upland openings through multi-year, landscape level initiatives. This project would complement the work that has been accomplished and allow additional impactful projects to continue adjacent to areas identified within the Zone Aspen Project toward healthy forest management.

Thank you for the opportunity to comment,

Heather L. Shaw, M.S.

Regional Wildlife Biologist-Eastern Great Lakes Region

The Ruffed Grouse Society and American Woodcock Society

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