

Todd Waldron
Ruffed Grouse Society & American Woodcock Society
Northeast Forest Conservation Director

March 21, 2022

Jay Strand
USDA Forest Service
99 Ranger Road
Rochester, VT 05767
Town, state Zip code

Re: DRAFT Supplemental Information Report - Review of New Information and Changed Circumstances: Early Successional Habitat Creation Project Environmental Assessment and Decision Notice Reduced Roads

Dear Mr. Strand:

Thank you for allowing us to submit comments on the DRAFT Supplemental Information Report - Early Successional Habitat Creation Project on the Green Mountain National Forest. We have reviewed the SIR document and this letter confirms that Ruffed Grouse Society and American Woodcock Society supports the proposed changes in the ESHCP project scope and that our organization is ready & available to be an active partner to the Forest Service in supporting and implementing this project through Shared Stewardship Agreements and however else we can support the agency's efforts.

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 (established in 2014), RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

Numerous wildlife species that require early successional (young tree and shrub) habitats are declining and identified in Vermont's Wildlife Action Plan as Species of Greatest Conservation Need, including ruffed grouse, American woodcock, golden-winged warbler, and New England cottontail. The Wildlife Action Plan identifies the decline of young forests as a threat to conserving the state's biodiversity and indicates conservation cannot depend upon natural disturbance events alone to create these habitats. According to USFS's Forest Inventory Analysis (FIA) data, early successional forest habitat, and balanced forest age class in general continue to decline precipitously. For instance, from the period 2005 to 2018, the FIA data reports that state-wide early successional habitat cover dropped from 6.7% to only 2.7%, a condition that's putting many bird and wildlife species on the brink.

Furthermore, Vermont's State Wildlife Action Plan p 14 reports *"Wildlife is very important to the people of Vermont. This love of wildlife is more than anecdotal. The 2011 National Survey of Fishing, Hunting, and Wildlife Associated Recreation conducted by the U.S. Fish and Wildlife Service documented that 62 percent of Vermonters went fishing, hunting, or wildlife watching. Vermont ranked second, only two points behind Alaska in participation (U.S. Dept of Interior 2011). When it comes to wildlife watching, however, Vermont was first in the nation with an impressive 53 percent of residents enjoying this activity. This same survey estimates more than \$704 million was spent on fish-and wildlife-based recreation in Vermont"*.

Ruffed Grouse Society and American Woodcock Society has been an ardent supporter of the Early Successional Habitat Creation Project (ESHCP) since its initial planning and scoping process in 2019. As a national conservation partner whose mission is to unite conservationists around forest sustainability and wildlife, we support the Forest Service's efforts to initiate this project and we look forward to working with the agency as a key partner and stakeholder.

On behalf of our members and supporters, we thank you for your careful consideration and action to support healthy forests, abundant wildlife and promoting a conservation ethic in Vermont. RGS & AWS would be happy to comment further or address questions on these considerations in your future deliberations.

Respectfully submitted,

Todd H. Waldron

Todd H. Waldron

Northeast Forest Conservation Director

Ruffed Grouse Society & American Woodcock Society

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