

16 October, 2023

Chris Thornton District Ranger Brownstown Ranger District ATTN: Blue Creek Salvage and Stream Restoration Project 248 15th Street Tell City, IN 47586

Dear Christopher Thornton,

Established in 1961, RGS is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with AWS (established in 2014), RGS works with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices and principles. That is why I am writing this letter on behalf of the RGS & AWS to express our **support of The Blue Creek Tornado Salvage and Stream Restoration Project** in Management Area 2.8 of the Hoosier National Forest. In addition, we would like to voice our strong opposition to any no action alternatives.

Ruffed grouse (*Bonasa umbellus*) are a forest-dwelling bird species whose population has precipitously declined in Indiana, where they were once abundant only a few decades ago. As such, the State of Indiana officially listed the ruffed grouse as a state endangered species on December 16, 2020. Ecologists and wildlife experts agree and have identified loss of young forest habitat as a significant contributor to population declines of ruffed grouse and many other young/diverse forest wildlife species. In fact, more than 42% of disturbance dependent forest birds in Indiana have experienced significant population declines over the past several decades with several species experiencing exponential declines due to loss of early successional habitat including: Eastern Tohee, Golden Winged Warbler, and Field Sparrow.

Acres of young forest across Indiana have declined 71.8% since 1986, according to Forest Inventory and Assessment (FIA) data compiled by the U.S. Forest Service. In that same time period, acres of young forest habitats on Indiana federal lands have declined 90%. While inconvenient for management, aesthetics, and certain recreational opportunities, this tornado represents a naturally initiated opportunity to manage young forest habitat consistent with the 2006 Land and Resource Plan (3-7, 3-8, 3-11, 3-13, and 3-15). RGS & AWS firmly believe the Forest Plan needs to be treated as the guiding document for forest/ecosystem management on the Hoosier National Forest. RGS & AWS also believe the Hoosier has the tools to do so utilizing Natural Range of Variation (NRV) as a mandated ecological reference model to evaluate ecological integrity within the 2012 Planning Rule. NRV establishes ecozone (i.e., forest type) specific ranges of forest seral classes based on the best available science of historic, pre-Euro-American forest conditions as a baseline. The NRV framework also stablishes spatial and temporal variation in those conditions based on natural disturbance, within a period of time and geographic area appropriate to a stated goal.

Lastly, RGS & AWS firmly believe actively managing this impacted project area would benefit a wide range of forest wildlife species, reduce risk of forest disease, wildland fire risk, identified flooding risks, and safety



hazards to recreational users. RGS & AWS trusts in the Forest Service staff and protocols to ensure the Blue Creek Tornado Salvage and Stream Restoration Project is in compliance with all Executive Orders, the Clean Air Act, Clean Water Act, Endangered Species Act, National Historic Preservation Act, Wilderness Act, National Forest Management Act, and all standards and guidelines established in the Forest Plan.

Thank you for your time and consideration,

Jon &

Jon Steigerwaldt Forest Conservation Director – Great Lakes and Upper Midwest Ruffed Grouse Society & American Woodcock Society 100 Hightower Boulevard, Suite 101 Pittsburgh, PA 15205 412-720-6033 jons@ruffedgrousesociety.org

412-262-4044 Toll Free 888-564-6747 www.ruffedgrousesociety.org