

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

October 3, 2023

Shawn Langston
USDA Forest Service
2538 Depot Street
Manchester Center, VT 05255

The Ruffed Grouse Society & American Woodcock Society Supports the GMNF's Grass Mountain Timber Sale and Early Successional Habitat Creation Project.

Dear Mr. Langston:

Thank you for allowing us to submit comments on the Grass Mountain Timber Sale.

RGS & AWS strongly supports this project and applauds the Green Mountain National Forest's Manchester Ranger District for their efforts to promote forest resiliency, wildlife habitat diversity and healthy and functioning forest landscapes. We support science-based forest management and silvicultural activities like those incorporated into the Grass Mountain Timber Sale proposal and we're available as a conservation partner to help the Forest Service move these projects forward.

RGS & AWS unites conservationists to improve wildlife habitat and forest health for ruffed grouse, American woodcock, and all forest wildlife. We promote forest stewardship for our forests and wildlife. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for people to experience them. Ruffed grouse and American woodcock are bellwethers of forest condition – they can only exist in healthy, diverse forests. These same forests clean the air, filter water and support local communities. Together with the American Woodcock Society (established in 2014), we work with government agencies to restore wildlife habitat diversity using science-based conservation approaches.

Our comments regarding the proposed vegetative management activities follow below:

The vegetation management recommendations proposed in the Grass Mountain Timber Sale are aligned and consistent with the forest-wide goals and objectives relating to ecological diversity found in Section 2.2.2 of the Forest Plan (USDA Forest Service 2006). Specifically, Goal 2 of the Forest Plan, which is to "maintain and restore quality, amount, and distribution of habitats to produce viable and sustainable populations of native and desirable non-native plants and animals." This includes numerous objectives associated with forest structure, composition and age class diversity. The approximately 128 acres of even and uneven-aged silvicultural system treatments in the areas designated within the Grass Mountain Timber Sale are a science-based pathway to achieving the Forest Plan goals and desired conditions and are congruent with the ESHC project goals.

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."

The recently-signed RGS & AWS Region 9 Agreement with the U.S. Forest Service was specifically structured to move projects like Grass Mountain forward. Through our partnership with the GMNF team, we will be adding staff capacity via a public lands' forester position dedicated solely to this and other GMNF vegetation management projects and building up our capacity to work with partners on shared stewardship.

RGS & AWS supports and applauds the Grass Mountain Timber Sale Project. As a national and regional conservation partner with members and a chapter in the Green Mountain State, 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, climate solutions and promoting a conservation ethic in Vermont. RGS & AWS would be happy to comment further or address questions on these considerations.

Respectfully submitted,

Todd H. Waldron

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