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Comments: see attached file:

Mangers and stakeholders of our public lands are at a critical point regarding the direction of management. Conservationists have spent decades speaking of the documented decline of multiple species of flora and fauna and the ecologic neccessity of multi-aged forested landscapes. The need serves to not only provide habitat required by many declining species but the silvicultue systems employeed are our best defense against catastophic impacts from insect, disease and episodic weather events. At the present time it is unfortunate that acceptance of vegetative management has been in a reactive rather than proactive response for resiliency against the above factors. This has contributed to disrupting the integrity of the forest ecosystem.

This proposed action serves to address current landscape conditions and looks to the future integrity, health, resiliency and diversity of the natural components and upgraded ecosystem services. It is for these reasons that the Ruffed Grouse Society (RGS) fully supports the proposed action.

Considerations in Proposed Actions:

* Goal to maintain significant oak component.

* Shelterwood with reserves [ndash] little or no oak regen is stated. Not seeing the stand inventory data I would ask if there is currently sufficient oak of varying canopy position to provide adequate stocking following first harvest entry from stump sprouting?
* What are the limiting factors in lack of adequate oak regen / advanced regen? Is it interfering or undesirable woody stems such as conifer sp?
* If a percentage of desiriable regen is not relying on stump sprouts is the seed bed substrate in a condition conducive to provide these opportunities?
* If the duff layer is inhibiting natural regeneration is there the opportunity for prescribed fire at a larger scale that would incorporate the proposed stands within the burn unit?
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Leave trees should be selected on traits relating to vigor and dispersal pothential not simply on age. Older trees may be compromised in seed production and structural integrety from repeated exposure to insect and disease or episodic weather events. Seed production potential both keeps this wildlife resource available and can contribute to natural regeneration process. Spacing of leave trees should be considered when possible for more complete stand coverage in restocking potential and these trees also provide a path of movement for canopy associated songbird species across the landscape.

* Further in the document the explaination of leave trees is more insightful and meets the objective set forth for stand diversity both silviculturally and in benefits to wildlife. The option for clumped or single residual tree selection enables the silviculturist to use their discretion in prescription and final marking.

* Existing condition of 4% of proposed area in a sapling pole stage exemplifies the nature of foresst succession and the need for vegetation management to continue creating a resilent landscape in age and vertical structure in perpetuity.
* Economic Impacts: It is my recollection that is one of the few USFS proposals I have reviewed that breaks this down to local impacts and contribution to the timber / wood products industry. I feel this is a crucial component in geographical representation and should be a part of all proposals for all forests. There is no shame in

demonstrating that silviculture generates funds and creates, enhances or sustains the diversity the Appalachian region is historically known for. In it[rsquo]s absence and / or the absence of wood product outlets, the ability to create, enhance or sustain this diversity becomes severly retarded. The added cost and lowered ROI diminishes the regional and local ecologic benefits by decreasing the number and or size of impactful projects providing forest disturbance.
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Direct and Indirect Impacts: It should be established that post-fledging and during mirgration many if not all songbirds classified as mature forest or canopy breeders utilize young forest stands for cover and food resources. Scarlet tanagers and ovenbirds are routinely encountered in mist net captures at varying ages, family groups and corresponding stages of molt. Birds are more suseptable to predation and exposure to environmental factors depending on their molt sequence. Oven birds in particular exhibit a rapid and relatively extensive complete molt sequence where the structure of the managed areas provides the protection necessary for survival through the sequence prior to fall migration.

The questions posed above are for consideration and do not require a response. I have total confidence in the silviculturist to implement the necessary stand inspections and subsequent treatments to achieve the desired conditions and outcomes intended. RGS looks forward to continued involvement in this project through implementation and monitoring of both vegetative and wildlife responses. This project is fully supported by RGS and we are appreciative of the opportunity to engage in the management of our National Forests.

Feel free to contact me for further discussion or clarification as needed regarding the above content.

Professionally

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