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First name: Kevin

Last name: Sterling

Organization:

Title:

Comments: As a strong advocate for the conservation of diverse age class forests, I submit this public comment in support of maintaining a balance between preserving old-growth ecosystems and promoting active management to support wildlife species such as the ruffed grouse and American woodcock. While the proposal to conserve old-growth forests outlined by the U.S. Department of Agriculture (USDA) is commendable, I would urge a nuanced approach that also prioritizes the creation of young, early successional forests, which are critical to the survival of these species.

Ruffed grouse and American woodcock rely heavily on early successional habitats-forests characterized by younger, diverse age classes. These habitats, rich in young saplings, shrubs, and dense undergrowth, provide essential cover, food sources, and breeding grounds for these species. As old-growth forests continue to expand under this plan, we must ensure that habitat diversity is maintained, as early successional forests are rapidly declining across the U.S., which has contributed to significant population declines of these species.

Increased focus on active forest management, such as selective timber harvest and prescribed burns, will not only create the young forest structure necessary for ruffed grouse and woodcock, but also promote overall forest health. These management practices reduce competition among trees, enhance biodiversity, and improve resilience to pests, disease, and climate-related stresses such as wildfire. By ensuring that diverse age classes of forest exist, we can foster habitat for a broad range of species, including deer, songbirds, and pollinators, while still adhering to the core goals of climate resilience and carbon sequestration.

The proposal's emphasis on prohibiting vegetation management within old-growth conditions must allow for flexibility where it can be demonstrated that such management promotes ecosystem diversity. Habitat for early successional species can be created without compromising carbon storage or biodiversity goals. It's essential that localized forest plans include these considerations, as the one-size-fits-all approach to old-growth conservation may inadvertently harm species that rely on different habitat types.

In conclusion, while conserving old-growth forests is a critical component of climate resilience and biodiversity, we must also ensure that young forests are actively created and maintained. I urge the USDA Forest Service to incorporate strategies that balance the conservation of old-growth with the necessity of early successional forest management. This dual approach will better serve the long-term goals of biodiversity conservation, forest resilience, and carbon sequestration, while also providing critical habitats for species like the ruffed grouse and American woodcock. Thank you for considering this important balance as part of the final plan amendment.

Sincerely,

Kevin Sterling

Advocate for Diverse Forest Ecosystems