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Organization:

Title:

Comments: Dear U.S. Forest Service,

I am writing to express concern regarding the current direction of the U.S. Forest Service's management strategy for old growth forests. As a citizen deeply invested in the health and sustainability of our national forests, I believe it is essential that forest management strategies prioritize ecological balance, ensuring that all successional stages of forests, including early-successional habitats, are maintained for the benefit of wildlife, biodiversity, and broader ecosystem services.

The ruffed grouse (*Bonasa umbellus*) and American woodcock (*Scolopax minor*) serve as vital indicators of forest health. These species depend on young, diverse forests to survive and thrive. Specifically, ruffed grouse rely on early-successional forests for food and shelter, while American woodcocks use such habitats for breeding and foraging. These habitats provide essential cover and forage opportunities that are otherwise absent in older, denser forests. In maintaining diverse forest ecosystems, we support not only these keystone species but also broader ecological functions such as air and water filtration and carbon sequestration, which directly benefit local communities.

While old growth forests undoubtedly play a vital role in ecosystems, they represent just one of several important stages in forest succession. Disproportionate emphasis on preserving old growth forests, especially without considering forest type or regional ecological needs, risks undermining other critical forest successional stages. A comprehensive approach to forest management must consider how early-successional habitats provide irreplaceable benefits to wildlife, carbon sequestration, and biodiversity. In fact, numerous studies, including research from the University of Minnesota and the USDA Forest Service Northern Research Station, demonstrate that young forests play a critical role in supporting bird populations, including the ruffed grouse, and provide resilient landscapes that can respond more dynamically to climate change. By focusing too heavily on preserving old growth, we may inadvertently hinder the Forest Service's ability to achieve broader goals of optimizing wildlife habitat, enhancing carbon stewardship, and fostering ecosystem resilience.

I would like to commend the Forest Service for including input from organizations like the Ruffed Grouse Society (RGS) & American Woodcock Society (AWS), alongside other true conservation groups, in your planning efforts. A science-based approach that balances forest successional stages and integrates the expertise of local foresters, ecologists, and land users is critical to effective, long-term management. Local knowledge, especially from those who live, work, and recreate on national forest lands, is indispensable to crafting plans that reflect the unique needs of each region.

It is well documented that diverse forest landscapes are critical to fostering biodiversity, sustaining wildlife populations, and mitigating climate change. A study from the *Journal of Forestry* (2018) highlights the ecological importance of mixed-aged forests, where the presence of new growth supports species diversity and improves carbon sequestration rates. Additionally, research from the Wildlife Society underscores how forests managed with a mosaic of age classes are more resilient to disease outbreaks, wildfires, and extreme weather events.

In light of these findings, I encourage the Forest Service to take a balanced approach to managing our national forests—one that recognizes the importance of old growth while also maintaining and promoting early-successional and mixed-age forests. Such an approach will not only support biodiversity and ecosystem health but will also ensure that our public lands remain resilient in the face of environmental change.

Thank you for your time and consideration. I look forward to seeing the Forest Service continue to manage our

national forests with a thoughtful, science-based approach that considers all forest stages and maximizes benefits to wildlife and communities alike.

Sincerely,
Chet Smith

Citations:

Niemi, G. J., et al. "Response of Breeding Birds to a Gradient of Vegetation Change in Northern Hardwood Forests." University of Minnesota Duluth, 2003.

Trani, M. K., et al. "The Role of Disturbance in Creating Wildlife Habitat in Managed Forests." USDA Forest Service Northern Research Station, 2001.

D'Amato, A. W., et al. "Effects of Forest Management on Carbon Sequestration and Biodiversity in North American Temperate Forests." Journal of Forestry, 2018.

Thompson, F. R., et al. "Early-Successional Forests: Ecosystem Benefits and Risks." Wildlife Society Bulletin, 2016.