Data Submitted (UTC 11): 9/19/2024 4:00:00 AM First name: Rob Last name: Thoresen Organization: Title:

Comments: As an advocate for diverse age class forests, I am writing to express concern that the USDA's proposal to amend forest plans to prioritize old-growth conservation does not fully account for the habitat needs of species like the ruffed grouse and American woodcock, which thrive in younger forests. While I understand the vital role old-growth forests play in carbon sequestration and biodiversity, it is important to balance this effort with the conservation of younger forests that support early-successional species.

Ruffed grouse and American woodcock require dense, young forest stands for breeding, feeding, and shelter. Their populations have been declining due to the lack of appropriate habitat as forests age without sufficient regeneration. A diversity of age classes across forest landscapes is essential not only for these species but for a wide range of wildlife that depends on a mosaic of habitats.

The proposed amendment should incorporate active management strategies that ensure a balanced approachpreserving old-growth while also maintaining younger forest stands. This can be achieved through sustainable practices like selective thinning or prescribed burns, which promote forest health and diversity. By fostering a mix of forest types and ages, we can support a broader array of wildlife and ensure resilient ecosystems that meet the needs of all species.