



**ROCKY MOUNTAIN
ELK FOUNDATION**

December 5, 2019

Robert Claybrook
Redbird District Ranger
Daniel Boone National Forest
91 Peabody Rd.
Big Creek, KY 40914

Re: South Red Bird Project

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Environmental Assessment (EA) for the South Red Bird Project (Project).

The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 234,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forests. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.6 million acres of North America's most vital habitat for elk and other wildlife, including nearly 5,000 acres in the heart of Kentucky's elk country.

Scarcity of disturbance on National Forest Service lands since the 1990s (commercial and noncommercial harvests) has resulted in a skewed forest age-class distribution and relatively static structural characteristics within the South Red Bird Integrated Resource Management Area (IRMA). Additionally, decades of fire suppression have altered the natural progression of vegetation composition and structure. One specific forest component severely lacking in the Redbird Ranger District (and others) is early seral habitat. Early seral forest provides important habitat for elk and other wildlife, and is often achieved following disturbance such as prescribed fire and mechanical thinning.

The Daniel Boone National Forest Plan (2004) calls to maintain 5-6% of the Redbird Ranger District in early seral habitat (0-10 age class). A recent IRMA Landscape Assessment (2017) compared existing conditions to the Forest Plan Goals and Objectives. As identified in the 2017 analysis and the current EA, no early seral habitat exists in this IRMA.

RMEF supports the Purpose of and Need for Action as well as the proposed management Actions in order to reach Desired Conditions, as outlined in the Forest Plan. The proposed project would facilitate habitat enhancement and forest restoration on about 12,000 acres and conduct prescribed burns on approximately 7,500 acres. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees

that provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but also can help reduce the threat of future catastrophic wildfire. RMEF supports this work, which complements Forest Service fire, fuels, and vegetation management goals. RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management.

RMEF has a strong partnership with the Daniel Boone National Forest and has contributed financial and technical assistance to various projects within the proposed area. We look forward to continued collaborations with the Forest.

Thank you for the opportunity to review and comment on the South Red Bird Project.

Sincerely,



Blake L. Henning
Chief Conservation Officer