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Comments: Thank you for the opportunity to comment. My most significant concern with the Pine Creek project is the Forest Service's intent to log 1,300 acres for early seral habitat (young forest) using shelterwood methods (Action 1.A: Two-aged shelterwood). Early seral habitat is important for a wide range of species. However, there are less impactful ways to create and manage for this type of habitat that are more consistent with prevalent natural disturbance regimes. For example, research from the University of Kentucky has shown that logging small, roughly half-acre patches of trees, along with light thinning around the edges (also known as "femelschlag" or "expanding gap" systems), can result in much better oak regeneration than large even-aged harvests like those proposed in the Pine Creek project. I strenuously urge the Forest Service to drop the proposed shelterwood harvests and instead manage for early seral habitat and oak regeneration in the following ways:

- 1) Manage the nearly 5,000 acres of forests harvested in the project area since 1980. Many of these areas are now forests of poor quality, with prior logging resulting in conversion of oak-hickory forests to tulip poplar and red maple. Expansion and modification of "Action 6: Crop tree release" could meet the Forest Service's goals for early seral habitat;
- 2) Support the existing proposal for 980 acres of commercial and non-commercial management to restore fire-adapted woodland community types (Action 2: Woodland and wooded grassland/shrubland communities);
- 3) Support variable thinning along certain roadsides to create early seral and edge habitat and support rare species on 280 acres (Action 9.B: Roadside thinning);
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- 4) Consider uneven-aged management with small group selection using expanding gap or femelschlag prescriptions where the above approaches aren't sufficient.