Data Submitted (UTC 11): 12/5/2019 3:19:49 PM

First name: Lisa Last name: Beran Organization:

Title:

Comments: I am very concerned about the commercial logging prescriptions in the South Redbird project and believe that as proposed, they are not acceptable. Prior logging over the past few years in the nearby Group One Redbird project, implementing the same prescriptions on the same slopes and soils that they've proposed for the South Redbird project has resulted in mountainsides bulldozed into oblivion, landslides, erosion, and severe infestations of invasive species. All for the stated purpose, according to the Forest Service, for forest health and habitat improvement. Most of the streams in the South Redbird project are designated as Critical Habitat for the Kentucky arrow darter, which was listed as "threatened" under the Endangered Species Act in 2016. The project area also provides habitat for the federally-endangered snuffbox mussel. While the Forest Service insists that these species won't be harmed by logging because of protective standards in the Forest Plan, there have been documented numerous instances in the Redbird District where Forest Plan standards and state best management practices were woefully inadequate, or otherwise completely ignored to strip the mountains of their timber.

Instead of the proposed plan, the Forest Service also has the option of creating early seral habitat by managing the nearly 6,000 acres of the project area that were logged in the 1980s and 1990s. Surveys have demonstrated that those forests are dominated by tulip poplar and red maple, despite the Forest Service arguing that big cuts like these are needed to promote oak regeneration.

The Forest Service could modify their proposed "crop tree release" on 1,900 acres of these old logging sites to cut back the young tulip poplar and maple more heavily, supporting oaks and hickories while creating and enhancing early seral and young forest habitat, especially for grouse. These are all viable options that the Forest Service can use to meet their goals.

Thank you for the opportunity to provide comment.