Data Submitted (UTC 11): 11/30/2022 8:42:39 PM First name: Douglas Last name: Doerrfeld Organization:

## Title:

Comments: I strongly oppose this project. There should be forest management that significantly increases old growth forest and recreational opportunities such as hiking trails. Overwhelmingly that is what citizens are asking for. This project is largely dependent upon failed silvicultural practices of shelterwood two age prescriptions and clearcutting. The past 40 years of these silvicultural practices across the Daniel Boone National Forest have largely fallen short of producing the goals of The Land and Resource Management Plan. Tens of thousands of acres were logged using these methods over the past 35 years with the promise that the early seral habitat created would increase grouse populations and that oak hickory forests would regenerate. Grouse populations have not rebounded and regeneration of the predominantly oak hickory forests that were felled have largely failed. A 2019 forest survey from dozens of harvest sites over the past 35 years in the Cumberland Ranger District consistently showed that predominantly oak hickory forests that were felled are converting to predominately poplar red maple forest. If the Forest Service did a similar analysis in the Stearns District, I'm certain the results would be the same.

The Forest Service needs to retire the failed silviculture methods of clear cutting and two stage shelterwood harvests and begin uneven aged forest management. This will greatly reduce the introduction of invasive species, landslides common to the area and sediments reaching streams that contain threatened and endangered species while allowing oak hickory forests to regenerate. The increasing number of severe weather events now occurring and predicted to increase in the future caused by climate change will create numerous openings that will produce adequate habitat for grouse and other early seral habitat dependent species.