

Data Submitted (UTC 11): 8/24/2023 3:55:57 PM

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Title:

Comments: Nicole Taylor,

I am writing to express my concerns about the proposed Ruffed Grouse Habitat Enhancement Project in the Daniel Boone National Forest. You'll notice, perhaps, that I am not exactly a local. I live in Chicago, but I grew up in Cincinnati, and still return to the Morehead area to hike, swim, and spend time with family who have a house there where we birdwatch avidly. The area, the woods specifically, mean so much to me that I spent last year commuting once a month to hike the Shelton Trace trail, which travels through this proposed project area, from North to South. It is a breathtakingly beautiful trail with incredible plant and animal diversity.

During my hike, the trail traveled through one active logging operation, and the impact is shocking -- even though the trail in that segment was on a road similar to much of the proposed project area, there is a huge difference in hiking on a gravel forest road that is shaded and overhung by woods and one that is exposed to the sky, with the habitat completely disturbed by logging and the slow and tenuous years of regrowth. For decades, stretches of trail that border on or are surrounded by logging become undesirable, less traveled, and more dangerous to travel due to exposure (which contribute to heat exhaustion, excessive erosion, runoff, higher speed traffic, and other problems). With the Shelton Trace growing in popularity, and Morehead State increasingly identifying as a trail town, logging so close to the trail and to town seems to be working at odds with local interests. It seems essential to me that the Shelton Trace Association and the University's recreational organizations be involved as key stakeholders in planning and considering the impact of this project.

Additionally, there have been numerous natural disturbances nearby over the last decade or two. The idea of the need for additional human interference to promote mosaics seems shortsighted to me. There have been numerous impactful disturbances throughout the region opening habitat such as ice storms, wind storms, and fires, like the one in the Caney Creek region, adjacent to the Shelton Trace. Additionally, I have observed both clearcutting and proposals for other work that will open the canopy and provide additional edge conditions and young forest throughout the region. Rather than cutting an additional section of forest that has yet to fully recover from past harms, why not study the ongoing mosaic of the forest in more depth and consider if some of these past human and natural disturbances could not be made to provide habitat for the grouses with much more minimal effort and destruction? Why suggest additional disturbance of a National Forest without full environmental review? Why consider the lack of oaks, the final succession after disturbance, to be indicative of the need for further intervention when the thing they need to thrive -- time -- has not been allowed? Rather, please pursue an in-depth review of the successes and failures of past interventions here as a part of a full environmental impact review, and proceed as necessary to support the development of a thriving oak forest, instead of continuing to promote edge environments that preclude continuous mature woods, the rarest habitat today.

Grouse, as I understand it, already benefit from the kind of widespread disturbances that humans cause, even if those disturbances lie outside of this project area. There are quite a few endangered species that can only thrive in large areas of contiguous woodlands, including many songbirds and bats that deserve consideration and protection. Please do not proceed with this project without considering the full environmental assessment required by federal law, to ensure that promoting one species' interests does not come at a heavy cost to another.

My trip down the Shelton Trace was mostly possible because the trail, along its entire length, rarely goes more than ten miles without coming out into some form of disturbance: a road walk, a field, a town, a parking lot, I-64, old fire, pasture, resorts, etc. Some of the disturbances are natural and support healthy ecosystems, like

brehtaking meadows of wildflowers or jaw-dropping windfalls demonstrating the strength of wind and storm and the advanced age of giant trees that give way. But some are heartbreaking, like the previously mentioned logging, the degradation of waterways due to overuse of adjacent paths by users who promote erosion, and the introduction and maintenance of invasive species like kudzu by mismanagement. Continuing to disturb an area that is recovering from past natural and man-made disturbances makes it harder and harder for an area to truly recover.

I walk the trails in Morehead regularly, and every time I walk them I find trees down on the trail. There is constant disruption, and I urge you to consider this before introducing additional disruption and deforestation of any kind. A full Environmental Assessment is an essential step in ensuring this and all projects are well-designed for true conservation now and into the future. It is ludicrous to suggest approving a proposal that will only be fully detailed later. It is time for the public to be full stakeholders in conservation, and for proposals to include the intersection of species and interests in full proposals with complete analysis prior to approval. Anything less seems shortsighted in a world with such limited environmental resources.

Best,  
Maria