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Comments: I would like to offer the following comments on the "Ruffed Grouse Habitat Enhancement" project

Statements in quotation marks are from the Scoping Document

1. "The proposed project would implement several non-commercial, commercial, prescribed fire, and/or non-native invasive species control treatments across the landscape for the next several years as conditions warrant."
This statement is so general that it makes specific comment on possible adverse impacts of treatments impossible as well as judging whether the use of a CE is justified. It is essential to know what, where, when and how much of the non-commercial, commercial, prescribed fire, and/or non-native invasive species control treatments will be implemented. The scoping document has maps of treatments in only compartment one. There is no information of the scope and scale or timing of the various treatments across the other 3 compartments of the project.
2. "This area experienced ice storm damage in the early 2000s and was salvage harvested from 2008-2017. Some of the resulting stands are regenerating to red maple and tulip poplar species, neither of which provide a primary or substantial food source needed by ruffed grouse. Intermediate silviculture treatments within these stands would promote oak growth."
The ice storm that occurred in February of 2003 did have varying impacts on forests throughout central and northeastern KY including the DBNF. The DBNF Ice Storm Recovery Project implemented large scale recovery harvests that felled trees with 35% or more canopy losses. As my comment to the FS at that time stated there was no scientific basis for assuming that trees with only 35% canopy loss would not recover. There was scientific studies showing trees with 50% and more canopy loss would recover. The resulting salvage logging removed thousands of acres of oaks that would have recovered and would be producing substantial food needed by ruffed grouse. The salvage logging not the limited canopy loss from the ice storm is what released the tulip poplar and red maple understories.
3. "The current forest condition of the Cumberland Ranger District's ruffed grouse prescription area does not include all the essential habitat components necessary for a population to thrive. As the Forest Plan states, the project area will be managed on a sixty-year rotation. This means the trees should be allowed to grow until they are 60 years old and then should be regenerated to create younger age-classes. The current average age of stands in the Ruffed Grouse Prescription Area are much older than sixty (see Figure 1.)."
Forest Service maps show that around 50% of the Grouse Management Area has been subjected to logging since 1980. Given that, it is difficult to understand how the average age of trees could be "much older than 60 years".
4. "Additionally, a very small percentage of stands exist within the five-to-fifteen-year age-class - this is the essential habitat for adults. Those stands that are currently younger than sixty are a result of salvage harvests that occurred in the area in the early 2000s. Several hundred acres of salvage treatment was implemented due to ice storm events in the early 2000s. Some of these treatments resulted in young stands while most of the treatments resulted in thinned stands. Thinned stands (of the current age class) do not create the ideal suitable habitat that adult grouse require."
It is well known that Grouse require, in addition to 5 to 15 year age class, structurally diverse forests and old forests. So why would the Forest Plan state the entire 5,000 acre Grouse Management Area will be managed on a 60 year rotation? A recent site visit I made to the planned shelterwood cut areas along 977b and along and south of 977d revealed that these areas have white oak stands of 2' in diameter and above. The very trees that are needed for valuable food sources are being planned to be logged. Why not keep the few older stands of oaks that are producing regular mast and create the 5-15 year old habitat from the scores of sites that were logged since 1980?
5. "Interpreting the graph, grouse populations increased when landscape level disturbances took place. There is

a sharp increase in drumming detected immediately after the early 2000s ice storm, and a sharp decline in the species population approximately fifteen years post-storm corresponding with the decline in early seral habitat preferred by breeding adult grouse."

I think the interpretation of the graph is in error. If the Ice Storm of 2003 had any effect on the grouse population there should have been a lag in the population increase for at least 5 years until 2008 (or 2013 if the above stated Ice Storm salvage harvests released the understory). This would allow trees released by canopy openings to reach the five-to-fifteen-year age-class. It should have stayed high for 15 years thereafter until 2023 (or 2028 if calculated from the salvage logging starting in 2008). Instead, the grouse population begins a steep decline in the heart of the 5-15 year old age group. I'm curious why the graph ends in 2016. Where is the data from 2016 until 2023? I suspect that the grouse population began to increase. There is a much more likely explanation for the rise and fall of the grouse population between 2003 and 2016. It is well known that grouse populations throughout their range rise and fall at intervals of about 10 years depending upon available food and cover, predations and weather. Cold winters without snow are particularly hard on ruffed grouse. While grouse population declines are been attributed to decreased logging and other changes in forestry practices leading to reductions in early-to-mid successional habitats, the impact of West Nile Virus on the grouse population has not been studied in the DBNF. There is no mention of the potential impact of West Nile Virus on grouse populations in the Scoping Document and to my knowledge the FS is not studying it's impact on grouse.

6. No mention of the Sheltowee Trace National Recreation Trail running 6 miles through the heart of the Grouse Project area.

I and others in the Cave Run Lake Chapter of the Sheltowee Trace Association worked with Jon Kazmierski for 8 years on trail issues. One of these issues in 2017 involved one of the last logging operations from the Ice Storm Recovery Project. It was in the Upper Elk Lick Fork area in Rowan County. The Sheltowee Trace National Recreation Trail ran through the location being logged. At issue were 14 large diameter trees located directly along the trail that were scheduled to be cut. We requested that these 14 trees be saved and others be substituted. A year later they were all cut down. In meetings with District Ranger Kazmierski afterwards he told us in the future that the we would be notified whenever proposed projects might impact the trail. It is disturbing to find that no mention of the Sheltowee Trace Trail is ever made in the Scoping for this project.

Conclusion: The effects of Global Overheating such as more frequent torrential rain, more violent thunderstorms, staightline winds not associated with thunderstorms, tornadoes and ice storms have been effecting KY and the DBNF for over 20 years. These types of events are expected to increase in frequency and intensity. The amount of 5 to 15 year old forest habitat will also be increasing due to these natural weather events. This will create the landscape-scale habitat that grouse need. The concept of a "grouse reservation" on several thousands acres is ill conceived. The best thing the FS can do to increase the resiliency of the forests in the face of Global Overheating on the DBNF is to end commercial logging.

Grouse hunters have 3 management areas in the DBNF with one in the northern portion of the Cumberland Ranger District. I would like to know where a 5,000 acre block of future Old Growth Forest Area is being planned for in the northern portion of the Cumberland Ranger District? I know of no accessible old growth forest in the DBNF in this area. As I proposed several times at meetings for the Blackwater Project, the Craney Creek/Minor Creek watersheds would make an ideal location for such a future large block of Old Growth Forest Area.