Data Submitted (UTC 11): 8/28/2023 8:44:44 PM First name: Whitney Last name: Hamblin Organization: Title:

Comments: The Forest Service plans to approve the Ruffed Grouse Habitat Enhancement project while skipping merrily, hand in hand with the Ruffed Grou\$e \$ociety. While there are many issues with this ill-conceived project, the biggest concern is the lack of environmental analysis and zero disclosure on where and how much logging is planned.

The National Environmental Policy Act REQUIRES the Forest Service to assess the potential impacts of logging projects, including soliciting public input and considering alternatives that limit environmental impacts. Instead, y'all have decided to get creative to avoid any troublesome analysis or disclosure to fast-track a major logging project in an area that was already heavily logged from 2008 to 2017 in response to the 2003 ice storm. This entire project violates NEPA.

I see through this PR spin, y'all! This is not a habitat restoration or enhancement project - this is a way to get more high-value white oak out of our forests to feed the regions stave mills.

This project area has seen decades of logging, extraction, and natural disturbance. Until we have MORE information from the Forest Service about where, what, and how much...how can we possibly be able to make an informed comment about the potential impacts of this project?? The Forest Service doesn't even know the potential impacts!!! Again....NEPA!

Please consider the following:

1. Please conduct a full Environmental Assessment (EA), including an analysis of impacts to the Sheltowee Trace. The Forest Service must consult with the Sheltowee Trace Association and address any concerns before approving the project. Please keep your word to preserve high-quality user experiences of the Sheltowee Trace, and do not log along the trail or in its viewshed.

2. Please support upland oak communities by felling small midstory trees with limited canopy thinning in addition to prescribed fire. Do not continue with failed oak regeneration strategies where most or all of the canopy is logged.

3. The Forest Service should conduct a full Environmental Assessment instead of relying on a "Categorical Exclusion". The proposal and analysis need to include site-specific information, including where logging will actually occur. The Forest Service needs to analyze the possible effects of the project on rare species, recreational uses, and other resources and values. The Forest Service also needs to take a hard look at landslide-prone areas, especially at the boundary of the Grundy and Borden formations, which show evidence of significant slope stability issues. Please offer a public comment period on the analysis before making any final decision to approve the project.

4. Please protect interior forest habitats, which are increasingly limited in northeastern Kentucky. Please prioritize the recovery of endangered species that require mature and interior forests rather than species (like grouse) that benefit from ongoing logging pressures on private lands in the area. The Forest Service should conduct an analysis including private lands in the area to assess deficits in interior forests and consider this in planning any management in the project area.

5. The Forest Service should consider the amount of mature and old-growth forests in the project area and make management decisions that preserve these forests. The creation of young forest habitats should not rely on the conversion of mature forests but instead emphasize restoration work on old clear-cuts, edge thinning of

powerline corridors, wildlife openings, and other permanent openings. The Forest Service needs to consider the carbon sequestration effects of the proposal, including an accounting of carbon lost through the proposed timber harvest.

6. Please incorporate natural disturbance and landscape-level data into your analysis. This includes a reasonable estimation and assessment of forest conditions across ownerships in the vicinity of the project area.

You can wrap a turd in pretty packaging, but it's still a turd.