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First name: Terrell  
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Organization: Sierra Club, Greater Louisville Group  
Title: Chair  
Comments: To: U.S. Forest Service  
From: Sierra Club, Greater Louisville Group  
PO Box 20606  
Louisville, KY 40250

RE: Comments regarding Ruffed Grouse Habitat Enhancement Project #64521

We are writing with serious concerns about a proposed 5,000 acre logging project just north of Morehead along the Shelton Trace National Recreation Trail. The following are our requests:

- Please conduct a full Environmental Assessment (EA), including an analysis of impacts to the Shelton Trace.
- Please offer a public comment period on the analysis before making any final decision to approve the project.
- Please consult with the Shelton Trace Association and address concerns before approving the project.
- Please do not log along the trail or in its viewshed.
- Please do not continue with failed oak regeneration strategies where most or all of the canopy is logged.
- Support upland oak communities by felling of small midstory trees with limited canopy thinning in addition to prescribed fire.
- Please protect interior forest habitats, which are increasingly limited in northeastern Kentucky. 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 of any management in the project area.
- 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 clearcuts, 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 proposed timber harvest.

Thank you for the opportunity to submit our concerns.

Sincerely,

Terrell Holder, Chair  
Sierra Club, Greater Louisville Group