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Comments: The Office of Kentucky Nature Preserves (OKNP) has reviewed the proposed DBNF Stearns Ruffed Grouse Habitat Management Project and would like to provide the following comments regarding the proposed project.

1. OKNP maintains the states natural heritage database which includes records for rare plants. A review of the database determined that 3 species currently listed on the Kentucky Rare Plant List, and the DBNF Conservation Species list, occur in or immediately adjacent to the project area. The identified species includes Nettle-leaf sage (*Salvia urticifolia*), Cumberland oak-leech (*Aureolaria petula*), and Wood lily (*Lilium philadelphicum* var. *philadelphicum*).

Additional habitat for all three species is believed to occur in the project area. Populations of these species may be adversely affected by ground disturbing activities such heavy equipment operation and construction of temporary roads and log landings. Targeted surveys for additional populations of these, and other rare species that may occur in the project area, would be beneficial and facilitate adaptive management of the project area to ensure their persistence on the landscape. Suggested targeted survey areas include:

- a. The riparian areas of Copperas Fork, Martins Creek, and their tributaries.
- b. Forested slopes between Brush Creek and Big Branch which abut these drainages and their confluences with the Cumberland River.
- c. Shortleaf pine communities, that are not associated with previous mining operations, that may contain remnants of pine barrens communities.

2. OKNP recommends surveys for non-native invasive species (NNIS) and pre-project treatment of any large or dense stands of NNIS prior to conducting large scale ground and canopy disturbing activities that may result in increases of NNIS on the landscape.

We appreciate the opportunity to comment on project proposal. Please contact our office if you require additional clarification regarding our comments.