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Comments: 1. Rare Plants

The project area is home to historic, botanical wooded grassland communities associated with rare plant species. The Forest Service should partner with the Office of Kentucky Nature Preserves to conduct botanical surveys and adjust their plans based on the rare plants found in the surveys. The Forest Service should include wooded grasslands among this project's Desired Outcomes.

## 2. Late Successional Habitat Management

There are limited and inadequately distributed areas prescribed for late successional and old-growth management. This project must include better distribution of these forest types to ensure species have access to them within their habitat range. The project should also include additional areas prescribed for late successional and old-growth management to ensure compliance with the National Old-Growth Amendment and strengthen protections for mature, current, and future old-growth. The Forest Service should ensure that this project does not result in the loss of potential old-growth or existing old-growth. Instead, stands within areas prescribed for logging that include potential or existing old-growth should be managed to retain a significant amount of the older overstory.

## 3. The Forest Plan is OUTDATED

Forest plans set the overall management direction and guidance for every national forest. In the Daniel Boone National Forest, the Forest Plan was last revised in 2004 to include a mandate that a 5,784 acre area in the Stearns District be set aside for young forest and ruffed grouse habitat. However, Forest Plans are supposed to be revised every 15 years. Since our Forest Plan is so outdated, logging mature and old-growth forests to create early successional habitat is no longer in alignment with the National Old-Growth Amendment and requires revision with the latest science and data.