

First name: Tina Marie
Last name: Camp Scheff
RE: Jellico Vegetation Management Project #63037

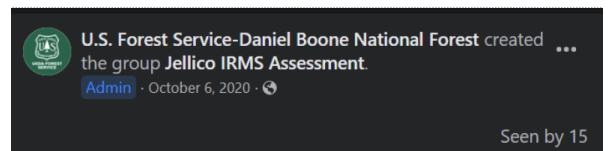
"Project Purpose: Vegetation management (other than forest products); Forest products. Project Activity: Forest vegetation improvements; Noxious weed treatments; Road maintenance; Road improvements/construction; Timber sales (salvage); Timber sales (green)."
Source: <https://www.fs.usda.gov/project/?project=63037&exp=detail>

Comments:

The Jellico Vegetation Management Project (Jellico project) should be withdrawn. If the Jellico project is not withdrawn it should be analyzed through the development of an Environmental Impact Statement (EIS) due to its size, timeframe, and the high potential for significant negative impacts.

Please excuse my typos and formatting and train of thought nature of this comment letter. I came down with COVID a few days ago and am not in a position to write with the clarity that I would like to. If there are missing citations please let me know and I'll be happy to forward them when I am recovered. I very much want my comments to give me standing in case I feel the need to file a formal objection to this project.

Last year, a Facebook group was started by the USFS, Daniel Boone National Forest as part of the Jellico IRMS Assessment process. People were led to believe that this forum was going to give opportunity for public input early on in the process of deciding what aspects of the Forest Plan's desired future condition should be worked on.



There are 112 members in this Facebook group. People attended the online forums and virtual field trips, and during each of these stages people expressed that they wanted to see more recreational opportunities offered in the area.

From the beginning of the IRMS public process, recreational use was downplayed by the USFS. The Jellico mountains are an increasingly popular area for recreation of all sorts, and is home to the largest Jeep Jamboree in the United States. The Jeep Jamboree brings in a lot of tourists and makes charitable contributions to the local community. If the Forest Service was able to overlook this large event, that has been happening for nearly 30 years now, and its impact on the community, what else has the agency missed?

I have never seen any visitor registration forms when I have recreated in the Jellicos which makes me wonder how the agency is measuring visitation.

Jeep Jamboree returning to Williamsburg next week

Posted On 12 Oct 2022 By: Timothy Wyatt Comment: 0 Tag: 29th Annual Gateway to the Cumberland, Alvin Sharpe, Bubby's BBQ, David's Steakhouse, Jeep Jamboree, Williamsburg Tourism



Dozens upon dozens of jeeps are set to converge on Williamsburg next week for the 29th Annual Gateway to the Cumberland Jeep Jamboree event.

There are currently about 178 Jeeps registered for this year's Jeep Jamboree, which is a bit of a decline from last year's participants, though Williamsburg Tourism Director Alvin Sharpe said that was something that event organizers had been expecting this year.

"We don't have any trails that can handle more than 15 Jeeps, so we had to cut the numbers down," said Sharpe.

Due to the trail limitations, Sharpe said that many Jeeps were having to wait around at the start of trails until they had cleared

before more could enter. Despite the lower numbers, this year's Jeep Jamboree will still be the largest in the United States and the world, according to Sharpe, who said Monday that he just received confirmation this week. The Gateway to the Cumberland's Jeep Jamboree has held that record for the past several years.

The event officially gets underway Thursday, Oct. 20, with registration and inspections, which will be done at Kentucky Splash Waterpark, and is followed by two days of trail rides on Friday and Saturday.

Bubby's BBQ is set to cater with a fish fry dinner Thursday night at the Williamsburg Tourism and Convention Center. David's Steakhouse will then take over catering for the Friday and Saturday night meals.

In addition to bring a large influx of tourists who spend money at local establishments, Jeep Jamboree also aids some local groups with fundraising opportunities.

The Williamsburg High School cross-country team will help with registration Thursday and assist in serving during that night's dinner. The Williamsburg High School girls basketball team will take over serving duties for the Thursday and Friday night dinners.

In addition, Immanuel Baptist Church will be providing Jeep washes on Friday and the Williamsburg High School cheerleaders taking over on Saturday.

Sharpe noted that there is still a need for additional land for the event. Not only has the large number of participants slowed access to the trails in recent years, but some of the beginner's trails have become more rugged over time and not suitable for novices anymore.

Jeep Jamboree USA is an organization out of California that conducts jamborees all over the United States. The events usually include Jeep enthusiasts from all over the country turning out for off-roading fun in their four-wheel drives. You must have a Jeep to participate in the Jeep jamborees.

The Forest Plan states that recreational opportunities are part of the Desired Future Condition for the forest. The Following are excerpts from the Forest Plan that make this point:

Opportunities for camping, motorized and non-motorized trail use, hunting, rock climbing, fishing, boating, and other recreational activities in undeveloped areas are provided in a manner that protects the ecosystem and heritage resources. All-terrain vehicle users access established networks of interconnected trails. Developed recreation areas provide safe, family-oriented outdoor recreational experiences in natural settings. Amenities in these developed recreation facilities accommodate the expectations of users. Accessibility is a part of the recreation facility setting.

GOAL 11 Provide habitat to sustain wildlife populations suitable for recreational pursuits such as viewing, photographing, hunting, and fishing.

GOAL 12.2 Provide motorized and non-motorized trails to address recreational demand.

Objective 12.2.A. When provided for, off-highway vehicle trail riding opportunities should be 15 miles or more in length.

When asked for comments, people expressed that they did not want to see a logging project move forward in the Jellicos. We did this because we suspected that the trend of increasing timber sales in the Daniel Boone National Forest was going to continue in the federal government's Jellico Mountain planning process. The USFS responded to public comments by saying there was no project being planned at the time, but we would be heard when a project was proposed.

Below is an excerpt from the Response to comments document:

JELICO IRMS ASSESSMENT COMMENT CONSIDERATION
SEPTEMBER 30, 2022

TOPIC	INPUT RECEIVED	ASSESSMENT TEAM RESPONSE
IRMS Process	I am extremely concerned about the planned project and it's effect on secondary old growth forest, slope stability, endangered plants and fish, soil erosion, and stream impact due to sediment from disturbance.	The IRMS process is done to assess the needs of the area, currently there are no planned projects. We will consider your input in future projects that may develop out of this IRMS assessment.
Plants, Insects, and Pathogens	I am very concerned that several species of endangered fish and plants will be seriously threatened by the proposed projects. Even substantial trees, such as Yellow Wood, will be damaged if the secondary old growth forest is removed, or damaged.	We know of no endangered plants in the Jellico area. There are some uncommon plants, such as the yellowwood. Individuals may be damaged, but during project layout, we will have the opportunity to adjust for some of these species. The IRMS process is done to assess the needs of the area, currently there are no planned projects. We will consider your input in future projects that may develop out of this IRMS assessment.
Hydrology	The steep slopes and weak soils often can't bear the weight of forest harvesting equipment. Land slides will certainly occur with old term damage to the surrounding forest and causing erosion into streams below the harvest areas.	The IRMS process is done to assess the needs of the area, currently there are no planned projects. We will consider your input in future projects that may develop out of this IRMS. Some areas of concern have been identified during site visits by specialists.
Recreational Opportunities	Please consider focusing on improved recreational opportunities in Jellico, undertaken in sustainable and environmentally friendly ways, rather than opening the area to destructive potential logging.	The IRMS process is done to assess the needs of the area, currently there are no planned projects. We will consider your input in future projects that may develop out of this IRMS assessment.
Soil Conditions	Please do not permit commercial activity and logging that would lead to additional landslides in the Jellico area.	The IRMS process is done to assess the needs of the area, currently there are no planned projects. We will consider your input in future projects that may develop out of this IRMS assessment.
Wildlife	Please protect our endangered plants and animals.	The United States Forest Service complies with the Endangered Species Act.

This response to comments was in September of 2022. Field Notes being written by Forest Service employees from July of 2020 through May of 2021 show that they were already evaluating the area for a vegetation management project. This makes me, a member of the public, feel very deceived. Why not tell us from the beginning if the only option for a project in the Jellico region was one based on commercial timber extraction?

Here are some excerpts from the Forest Service field notes that make it clear to me that the USFS staff on the ground were looking at the area with logging in mind well before the public was asked what we think should be prioritized for the area:

August 7, 2020:

Road considerably narrows from here to drain crossing; large concrete blocks at crossing have slide downstream along with large ss boulders; entire area appears not stable; not a lot of decent trees visible on other side from here, although small toe ridge may have chestnut oak; break in slope steepness about here and on other side; 50ft buffer for stream would not begin to address concerns for removing trees; recommend pull back to top of break or a little farther

August 11, 2020

P21: near confluence of two strongly scoured ephemerals, but showing on map as one drain; one of them cutting through what may be old slump based on shape of ground above and depth of downcutting, material all loose soil/gravel/rock; below this is a small slope break, then bench and another steep slope; treat area below as intermittent because of slope; unit boundary extends 130 ft downhill to N below point and 290 ft to the west; suggest drop the area to the north for reasons of stability

August 18, 2020:

LN1- Into unit 6251-13 at end of road. Entered near top of unit at west end. Walked down nose (to north of it) with intent to reach drain along NW boundary of unit; really steep above drain, scoured ephemeral; not sure how access to trees in drain would work- if end-lined, would result in ruts on slope—not good; drain more or less stable as is

Continued on contour to west, hit location with extremely steep slope to road; not operable from this location downslope; started finding higher density of AIAL seedlings; continued west and found area of AIAL in canopy*, trees mostly in 6-8" range; trees occur downslope to near road per Mac who went that way to look at drains at road; Claudia and I continued west out of unit to find end of AIAL, headed downslope to old road bed-lots of canopy AIAL on this, some to 14"; followed to west for a distance—did not reach end of AIAL, but thinned out; returned east on old road; could use this with some uphill bank cutting to provide more stable base to the big steep drain—not possible to get over this with road/trail; really steep here; continued east on contour, AIAL seedlings still abundant, but no canopy trees; mesic and in OKNP calcareous mesic forest area; lots of dead white ash up to 22", sugar maple to 20, tulip to 30, scattered who, basswood (rare), bitternut hickory (to 20"); floor mostly litter, some pockets with small clusters of blue cohosh and black cohosh; occasional 2-3.5" *Vitis aestivalis*; headed downslope to road-slope hard to walk on—walked along road for a bit

*Area of AIAL canopy of great concern; this is obvious source of seeds feeding high density AIAL seedlings in the two units; wind would blow seed that direction; this canopy needs to come out (be killed) before any harvest activity in either unit; size of trees suggests it might take two years, maybe more of treatment; can be done IPT EA NEPA; if treatment does not occur, the two units will blow up with AIAL and will be lost for reasonable silvicultural activities; additionally, the units could become a seed source to seriously infest hundreds to thousands of acres of both NF and private land; the seedling density alone is a serious problem in the two units; allowing a seed source to remain in the area is an additional, exceptionally troublesome concern; it would also be good if trees could be pulled out as they will affect soil as they decompose; however, given steepness, it is probably better to leave than move them, unless can be pulled out to west on old road

The above excerpt also discusses invasive species, especially Tree of Heaven, which is another Forest Plan Issue. This project, if implemented, would cause an explosion of invasive species and require unsuitable amounts of chemicals to attempt to eradicate. Here's the Forest Plan Goal for invasive species:

GOAL 2.3 Reduce outbreak populations of invasive species, or eradicate isolated infestations of invasive species from becoming established.

Objective 2.3.A. Eradicate isolated infestations of gypsy moth, and use the slow-the-spread strategy to monitor and manage gypsy moth populations ahead of the transition area.

Objective 2.3.B. Manage isolated occurrences of invasive species to avoid outbreak conditions.

Objective 2.3.C. Reduce the risk of damage from native and non-native invasive species through integrated pest management strategies.

The project is going to move the Forest away from many important aspects of its desired condition if the clearcuts proposed are implemented.

August 20, 2020 Field Notes, again showing that USFS were looking at the area for a timber sale while telling the public that our input matters:

General comments, no AIAL in stands at all; a little bit along road; no MIVI or other NNIS in stands; stands with steep slopes, operability will be rough because of access; Timber value on these three so far not great as many stems fire scarred, stems not large on average and mostly cho; no real stream channels in most areas, a very few scattered scoured ephemerals

August 29, 2020:

Overall, nothing of concern in two stands; 6253-27 does not seem to have enough volume to support a sale (low density and small trees); shy of intensive treatment of both smilax and *Kalmia*, not likely to get anything to come back on much of the site

6253-23 does need to be scouted at lower end for possible cliff; upper part of unit with low volume; lower part better

I sincerely hope that the Forest Service is taking all of our comments into consideration now.

From looking at regulations related to suitability of lands for timber sales, I believe that much of, if not all, of the Jellico Mountains is unsuitable for timber harvesting and should be designated as such.

From 36 CFR Part 219:

(v) Suitability of lands. Specific lands within a plan area will be identified as suitable for various multiple uses or activities based on the desired conditions applicable to those lands. The plan will also identify lands within the plan area as not suitable for uses that are not compatible with desired conditions for those lands. The suitability of lands need not be identified for every use or activity. Suitability identifications may be made after consideration of historic uses and of issues that have arisen in the planning process. Every plan must identify those lands that are not suitable for timber production (§ 219.11).

§ 219.11 Timber requirements based on the NFMA.

While meeting the requirements of §§ 219.8 through 219.10, the plan must

include plan components, including standards or guidelines, and other plan content regarding timber management within Forest Service authority and the inherent capability of the plan area, as follows:

(a) Lands not suited for timber production. (1) The responsible official shall identify lands within the plan area as not suited for timber production if any one of the following factors applies:

(i) Statute, Executive order, or regulation prohibits timber production on the land;

(ii) The Secretary of Agriculture or the Chief has withdrawn the land from timber production;

(iii) Timber production would not be compatible with the achievement of desired conditions and objectives established by the plan for those lands;

(iv) The technology is not currently available for conducting timber harvest without causing irreversible damage to soil, slope, or other watershed conditions;

(v) There is no reasonable assurance that such lands can be adequately restocked within 5 years after final regeneration harvest; or

(vi) The land is not forest land.

(2) The responsible official shall review lands identified in the plan as not suited for timber production at least once every 10 years, or as otherwise prescribed by law, to determine whether conditions have changed so that they have become suitable for timber production. As a result of this 10-year review, the plan may be amended to identify any such lands as suitable for timber production, if warranted by changed conditions.

(b) Timber harvest for purposes of timber production. A plan that identifies lands as suitable for timber production must include plan components, including standards or guidelines, to guide timber harvest for timber production or for other multiple use purposes on such lands.

(c) Timber harvest for purposes other than timber production. Except as provided in paragraph (d) of this section, the plan may include plan components to allow for timber harvest for purposes other than timber production throughout the plan area, or portions of the plan area, as a tool to assist in achieving or maintaining one or more applicable desired conditions or objectives of the plan in order to protect other multiple-use values, and for salvage, sanitation, or public health or safety. Examples of using timber harvest to protect other multiple use values may include improving wildlife or fish habitat, thinning to reduce fire risk, or restoring meadow or savanna ecosystems where trees have invaded.

(d) Limitations on timber harvest. Whether timber harvest would be for the purposes of timber production or other purposes, plan components, including standards or guidelines, must ensure the following:

(1) No timber harvest for the purposes of timber production may occur on lands not suited for timber production.

(2) Timber harvest would occur only where soil, slope, or other watershed conditions would not be irreversibly damaged;

(3) Timber harvest would be carried out in a manner consistent with the protection of soil, watershed, fish, wildlife, recreation, and aesthetic resources.

(4) Where plan components will allow clearcutting, seed tree cutting, shelterwood cutting, or other cuts designed to regenerate an even-aged stand of timber, the plan must include standards limiting the maximize size for openings that may be cut in one harvest operation, according to geographic areas, forest types, or other suitable classifications. Except as provided in paragraphs (d)(4)(i) through (iii) of this section, this limit may not exceed 60 acres for the Douglas-fir forest type of California, Oregon, and Washington; 80 acres for the southern yellow pine types of Alabama, Arkansas, Georgia, Florida,

Louisiana, Mississippi, North Carolina, South Carolina, Oklahoma, and Texas; 100 acres for the hemlock-Sitka spruce forest type of coastal Alaska; and 40 acres for all other forest types.

(i) Plan standards may allow for openings larger than those specified in paragraph (d)(4) of this section to be cut in one harvest operation where the responsible official determines that larger harvest openings are necessary to help achieve desired ecological conditions in the plan area. If so, standards for exceptions shall include the particular conditions under which the larger size is permitted and must set a maximum size permitted under those conditions.

(ii) Plan components may allow for size limits exceeding those established in paragraphs (d)(4) and (d)(4)(i) of this section on an individual timber sale basis after 60 days public notice and review by the regional forester.

(iii) The plan maximum size for openings to be cut in one harvest operation shall not apply to the size of openings harvested as a result of natural catastrophic conditions such as fire, insect and disease attack, or windstorm (16 U.S.C. 1604(g)(3)(F)(iv)).

(5) Timber will be harvested from NFS lands only where such harvest would comply with the resource protections set out in sections 6(g)(3)(E) and (F) of the NFMA (16 U.S.C. 1604(g)(3)(E) and (F)). Some of these requirements are listed in paragraphs (d)(2) to (d)(4) of this section.

(6) The quantity of timber that may be sold from the national forest is limited to an amount equal to or less than that which can be removed from such forest annually in perpetuity on a sustained-yield basis. This limit may be measured on a decadal basis. The plan may provide for departures from this limit as provided by the NFMA when departure would be consistent with the plan's desired conditions and objectives. Exceptions for departure from this limit on the quantity sold may be made only after a public review and comment period of at least 90 days. The Chief must include in the Forest Service Directive System procedures for estimating the quantity of timber that can be removed annually in perpetuity on a sustained-yield basis, and exceptions, consistent with 16 U.S.C. 1611.

(7) The regeneration harvest of even-aged stands of trees is limited to stands that generally have reached the culmination of mean annual increment of growth. This requirement would apply only to regeneration harvest of even-aged stands on lands identified as suitable for timber production and where timber production is the primary purpose for the harvest. Plan components may allow for exceptions, set out in 16 U.S.C. 1604(m), only if such harvest is consistent with the other plan components of the land management plan.

Based on many publicly available documents, as well as direct evidence presented by people who have lived in and logged those mountains for generations, it is undeniable that the slopes are unstable and will give way in response to the disturbance caused by logging.

I am against the government's proposal to kill native grapevines in the Jellico Mountains. Since grapevines are required for cerulean warbler habitat, they should be retained. This is in the Forest Plan:

- b) Create and maintain at least one approximately 7,400-acre area of cerulean warbler habitat³ in the Licking River Management Area, Upper Kentucky River Management Area, and the Jellico Mountains of the Cumberland River Management Area. Each 7,400-acre area can be composed of tracts at least 618 acres in size connected by corridors of either upland hardwood forest or riparian areas. Upland hardwood forest corridors should be no more than two miles long, and at least ¼-mile wide (see Figure 2 - 1 for example of possible pattern).

² Aquatic PET species are also addressed in the Riparian Corridor prescription (1.E).

³ Predominantly mature (age≥70), open (60 BA and up) contiguous upland hardwood or riparian forest (canopy with moderate to dense shrub/midstory layers, large grapevines are required in the mix; Buehler and Nicholson 1997), with some trees >20 in.; can be upland or bottomland/riparian. Contiguous is defined as having no more than 5 percent of the area in grassy openings, regenerating forest with less than 40 BA canopy, or roads greater than 50 ft. in width; tracts may be composed of blocks of minimum 618 acres in size connected by upland hardwood corridors approximately 0.25 mile wide or riparian corridors at least 100 ft. wide, neither of which is more than 2 miles long.

Grapevine control/invasive species control should be separately categorized from the other species targeted for herbicide treatments, instead of grouped together in the chart like it is now:

TREATMENT TABLES

Table Key:

- CC = Clearcut
- DH = Deferment harvest
- HR = Harvest residuals
- 2A = Two aged shelterwood
- THIN = Commercial thinning or CTR
- MR = Midstory removal
- CTR = Crop tree release
- PHSP = Pre and/or post-harvest site prep
- NNIS/GV = Non-native invasive species and/or grapevine control

Table 1: Treatment (TRT) by Stand

Compartment	Stand	Acres	TRT 1 ²	TRT 2 ³	TRT 3 ⁴	TRT 4 ⁵
6247	1	28	CC	PHSP	CTR	
6247	5	32	CC	PHSP	CTR	
6249	11	14	CC	PHSP	CTR	
6249	34	11	CC	PHSP	CTR	
6251	2	43	CC	PHSP	CTR	
6251	3	11	CC	PHSP	CTR	
6251	5	80	CC	PHSP	CTR	
6251	11	9	CC	PHSP	CTR	
6251	13	43	CC	PHSP	CTR	
6251	25	14	CC	PHSP	CTR	
6252	8	59	CC	PHSP	CTR	
6252	9	33	CC	PHSP	CTR	
6253	11	6	CC	PHSP	CTR	
6253	13	42	CC	PHSP	CTR	
6253	21	49	CC	PHSP	CTR	
6253	24	42	CC	PHSP	CTR	
6253	30	44	CC	PHSP	CTR	
6254	16	24	CC	PHSP	CTR	
6255	6	44	CC	PHSP	CTR	

² TRT 1 = the first treatment conducted within the indicated stand. It could occur at any time within the next 40 years (approximately 2023-2063).

³ TRT 2 = second treatment conducted in the indicated stand. PHSP (pre/post-harvest site prep) would occur immediately before or after a harvest treatment; a CC or 2-age treatment would occur approximately 6-12 years after a MR treatment; a THIN could occur at any time after invasive species and/or grapevines have been treated.

⁴ TRT 3 = third treatment conducted in the indicated stand. CTRs would occur between 15 and 30 years post-harvest; HRs would occur 10-15 years after initial harvest; PHSP would occur immediately before or after a TRT 2 harvest.

⁵ TRT 4 = fourth treatment. CRTs would occur 15-30 years after the TRT 3 harvests of the indicated stands.

In my opinion, grapevines should be left to grow and not killed at all in the project area, since they are a native species and are providing a needed ecological niche. They provide food and shelter for a huge amount of wildlife, including species in decline and sensitive species, and are a natural, essential part of the local ecosystem. The only reason given in the Jellico proposal for killing these native species is to protect the value of timber products for extraction. Economic gain should not come at the expense of such huge ecosystem loss on our National Forest. This approach to grapevines is at odds with Forest Plan goals to protect wildlife.

The Jellico project as proposed would have significant effects on the environment and people. I believe the statement of purpose and need is too focused on keeping forest from becoming old growth, and ignores recreation and tourism needs. The project is already a source of stress for the community, who have recently dealt with flooding. The Forest Service is not being a good neighbor with this proposal, and the process has left a lot to be desired.

When local residents organized a forum, it at first appeared that the Forest Service was trying to take it over. I am very glad the forum happened, and applaud the community organizers who made it happen. It was a very informative meeting. I am concerned, however, that as part of the process of making the public aware of it, the Forest Service failed to send the invitation out to the list of people who are subscribed to the Jellico Project listserv. I received the invitation through a bcc email from

Jellico Vegetation Management Project Public Meeting Announcement Inbox x



Hull, John -FS <john.hull@usda.gov>

to Timothy, Kathryn, Amy, John, Mary, Timothy

Good Afternoon,

The Stearns Ranger District of the Daniel Boone National Forest is open to the public and anyone may attend. The meeting details are as follows:

Time: Thursday, November 17, 2022, 4:00 PM

Location: Whitley County Cooperative Extension
4257 US-25W North
Williamsburg, KY 40766

All meeting attendees are encouraged to read the meeting agenda.

Any questions about the project or this meeting, please contact me.

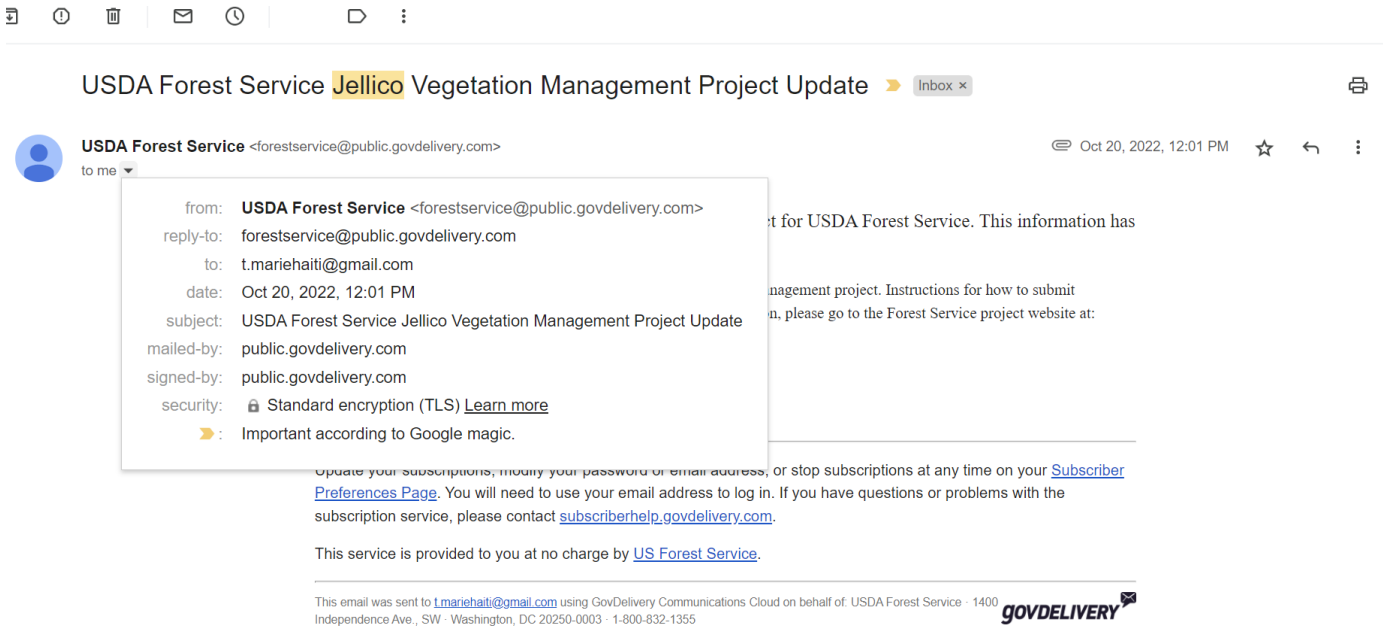
Thank you for your time.

Sincerely,

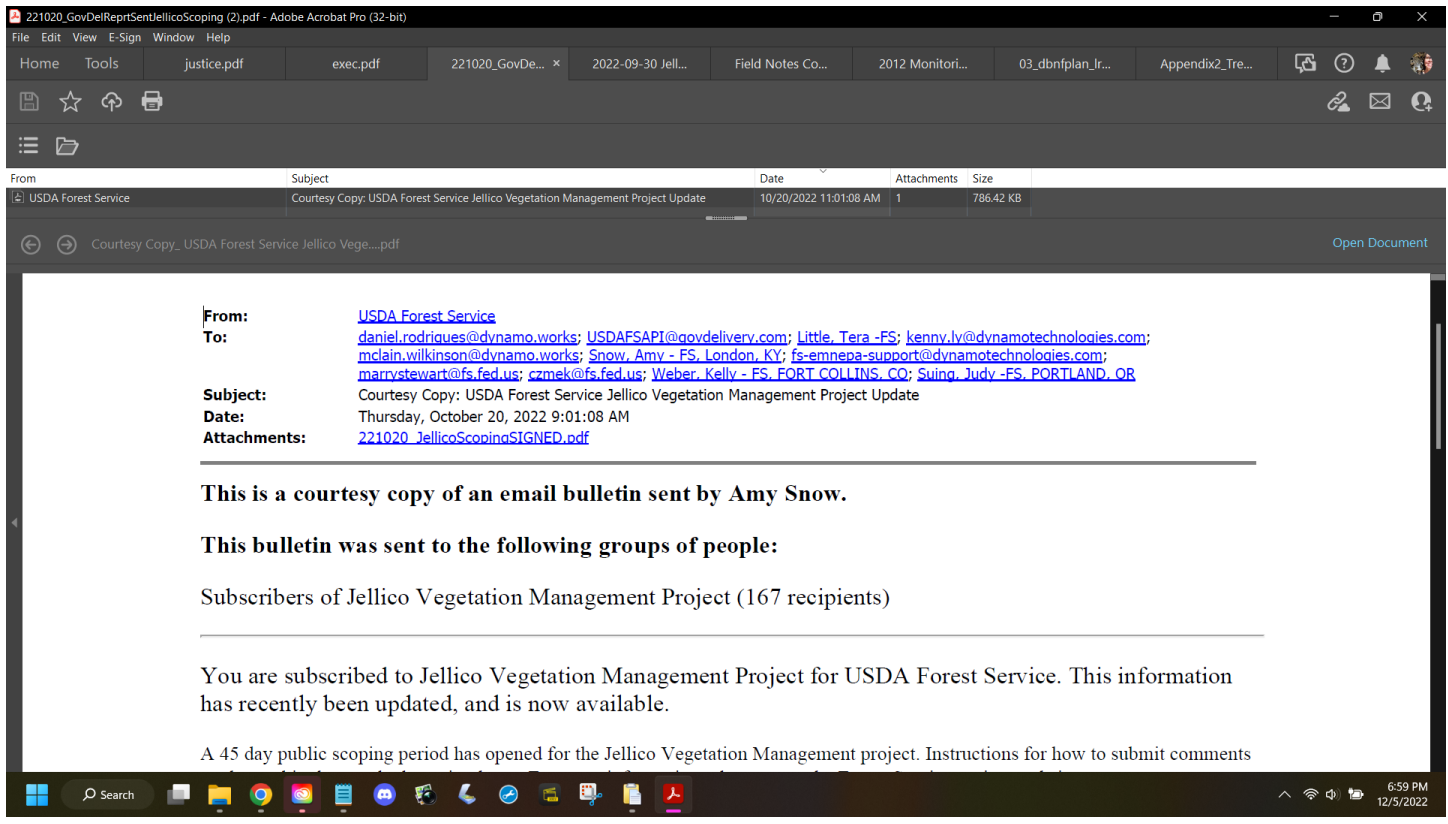
from: **Hull, John -FS** <john.hull@usda.gov>
to: "Reed, Timothy -FS" <timothy.reed@usda.gov>, "Fitzsimmons, Kathryn - FS" <kathryn.fitzsimmons@usda.gov>, "Snow, Amy - FS, London, KY" <Amy.Snow@usda.gov>, "Hull, John -FS" <john.hull@usda.gov>
cc: "O'malley, Mary - FS" <Mary.O'Malley@usda.gov>, "Eling, Timothy - FS" <Timothy.Eling@usda.gov>
date: Nov 1, 2022, 4:57 PM
subject: Jellico Vegetation Management Project Public Meeting Announcement
mailed-by: usda.gov
signed-by: usda.gov
security: Standard encryption (TLS) [Learn more](#)

Jellico Vegetation Management Project. This meeting is concerning the project. Meeting details are as

Compare this to when I get an email from the official listserv:



I am concerned that the people who signed up to receive updates might have missed out on this important opportunity for public input. That's 167 people on the list according to the courtesy bulletin that went out.



I am concerned that known populations of Ginseng will be destroyed by this project, especially on the context of this plant being low enough in number that the Forest Service no longer allows permits to collect it. This is an increasing loss of our natural heritage. This goes against the Forest Plan as well. You know the sections I'm talking about... I'm too tired at this point to take pics of all of your docs for you... This also causes conflicts with many environmental justice issues:

There are many plants and animals in the project area that are rare and declining. The Forest Service chooses willful ignorance by not conducting proper surveys for them. This includes endangered bats especially. And other animals, such as the Allegheny Woodrat, which are not currently listed but are declining rangewide. I have observed Allegheny Woodrat in the project area, and am very concerned that your lack of protection for its home will lead to further declines. From your field notes I can see that efforts are being made to not include its habitat as cliffline habitat which would otherwise be protected.

A. NEPA Generally

NEPA's fundamental policy is to "encourage productive and enjoyable harmony between man and his environment."¹⁵ In the statute, Congress "recognizes that each person should enjoy a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment."¹⁶ The following goals, set forth in NEPA, make clear that attainment of environmental justice is wholly consistent with the purposes and policies of NEPA¹⁷:

- to "assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings"¹⁸;
- to "attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences";¹⁹
- to "preserve important historic, cultural, and natural aspects of our natural heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice"²⁰; and
- to "achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities."²¹

These goals are promoted through the requirement that all agencies of the Federal government shall include in every recommendation or report on proposals for legislation and other

The forest plan definition for cliffline allows you to exclude areas where the cliff is interrupted by a large enough gap. So, you would be logging right through the woodrats habitat.

From the Forest Plan:

"A cliffline community is the area between 100-foot slope-distance from the top and 200-foot slope distance from the dripline of a cliffline. A cliffline is a naturally occurring, exposed, and nearly vertical rock structure at least 10 feet tall and 100 feet long. A cliffline is continuous if segments are separated by no more than 300 feet. Wherever the described conditions are found, those sites will be included in this Prescription Area.

This Prescription Area, found in all Management Areas, is currently estimated at approximately 111,200 acres across the DBNF.

This Prescription Area is classified as Unsuitable for Timber Production – Tree cutting, tree removal, or timber harvest may occur on an unscheduled basis to attain Desired Future Conditions.

Desired Ecosystem Condition: This area is managed to maintain its unique ecosystem and to support habitat for viable populations of the flora and fauna that are cliffline associated. Clifflines also function as travelways for many forest species and serve to maintain connectivity between other habitat areas. This ecosystem contains diverse transition zones, from dry to xeric above the cliff, to mesic or riparian communities below. Old trees are often found both above and below clifflines.

Cliffines often have seasonal, or ephemeral, wet driplines containing both flora and fauna that require such environments. Cave openings and rockshelters are common in this area. Many species of bats and other small animals inhabit dark areas and caves at various points along these cliffs.

1.C-Goal 3. Manage cliffines, including rockshelters, to protect and allow study of the rich archaeological deposits frequently found in this area. Respect Native American values and protect traditional heritage properties whenever possible.

1.C-Objective 3.A. Initiate a site-stabilization program for known archaeological sites, in consultation with the State Historic Preservation Officer and interested federally

recognized tribes.

1.C-Objective 3.B. Initiate a data recovery plan for significant archaeological sites that cannot be adequately protected.”

I think the fact that Allegheny Woodrat is present is evidence that the habitat meets the definition of cliffline, as it is providing habitat for a cliffline specialist.

In your IRMS documents it is stated that archeology/ cultural sites are not properly documented as they should be to be in line with the desired condition in the Forest Plan. I see that this project proposes to have someone look at each potential site before logging can occur. I sincerely hope that this work is given the time it needs to conserve our heritage resources. I feel that this is the sort of work that needs to be happening on the Forest, and should not require a resource extraction project to initiate it.

It is also evident that the aquatic information you are working with is out of date. This needs to be updated in order for proper resource planning to happen. Again, I see this as willful ignorance to move forward with drastic cutting that is approved for over a very long time period without taking into consideration current information about the species it would affect.

Here’s an example showing that the aquatics information is not current:

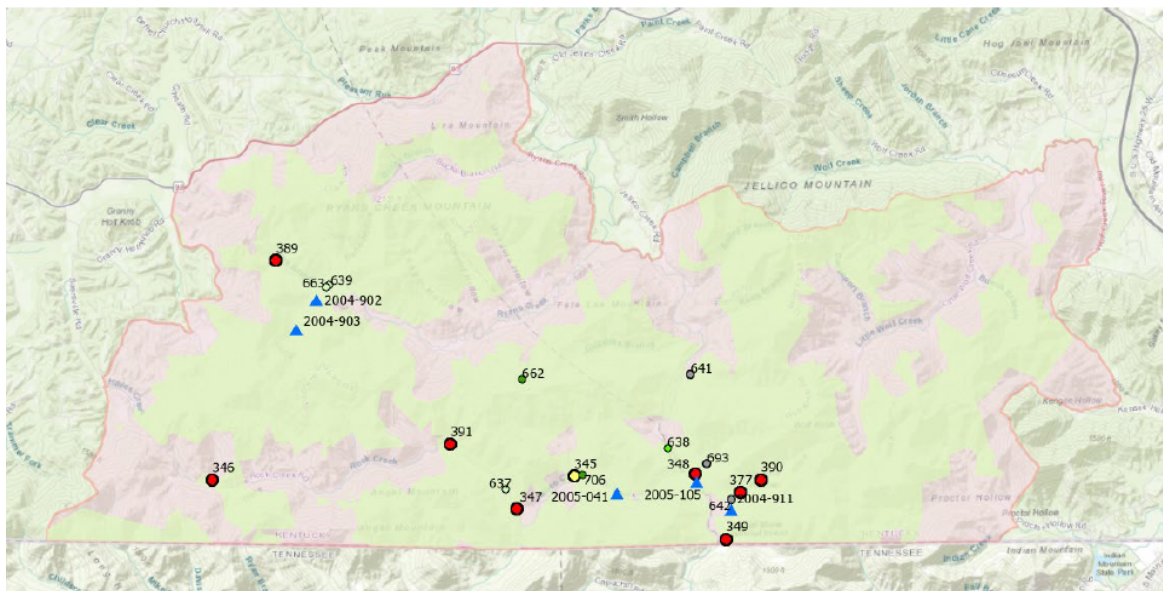
From: Roghair, Craig N -FS <craig.n.roghair@usda.gov>
Sent: Wednesday, December 16, 2020 11:14 AM
To: Commens-Carson, Amy - FS <Amy.Commens-Carson@usda.gov>; Evans, Theresa A -FS <theresa.evans@usda.gov>; Cherry, Mac - FS <Mac.Cherry@usda.gov>
Cc: Krause, Colin W -FS <colin.w.krause@usda.gov>
Subject: RE: DBNF - CATT

In advance of our Jan 7 meeting I wanted to share the data for the Jellico Project Area that we have in our CATT archives. The map below shows 2 different datasets:

1) Aquatic Organism Passage Points (circles). The larger circles are sites we surveyed for fish passage; red = difficult, yellow = moderate, green = easy fish passage. The smaller circles were not surveyed because they were bridges, no upstream habitat, or fords (various shades of green; assumed passable), or we didn't have access (grey). **Note that all these data are from 2005, so might not represent current conditions.** See the table below the map for additional details. FID matches the number on the map. Looks like we only collected on NFS managed lands; no private land sites.

2) Stream Monitoring Points (blue triangles). These data are from the stream monitoring work we've done on the DBNF over the years. Again, these are from 2004 – 2005; good baseline info but are **not very current.** See bottom table for additional info; we have the habitat, fish, and pebble count data [summarized in CATT reports](#) and the raw data are in our local databases. This [additional report](#) compares 1991 to 2004 data collected at 3 of the Jellico sites.

Looking forward to our meeting!



Resource Concerns

Heritage Site Preservation

While the Forest has documented some heritage sites in the area, there are likely still others that remain to be found.

Before the Forest can carry out a resource management action in an area, like a timber sale, archaeologists must conduct a Phase I Survey on the areas. This survey involves digging shovel test probes in a systematic pattern and screening the soil to look for evidence of historic and prehistoric use. Evidence, which can range from soil features to artifacts, is documented with pictures and site mapping. Archaeologists pay special attention to slopes, rock overhangs, and clifflines where rockshelters may have preserved heritage sites to a higher degree.

If they find a site, Forest archaeologists use the recorded evidence and consultation with the Kentucky State Historic Preservation Office to determine the site's "significance."

I also believe that the proposed cutting on steep slopes is not in line with the following aspects of the Forest Plan:

From DBNF forest Plan:

Silviculture in Steep and Mountainous Areas: From past experience, cable logging systems have proven to be unacceptable in single-tree selection or thinning harvests where a large number of residual trees remain, since much damage is done to the residual trees during log skidding. However, in most situations on the steep soils of the Forest, an adequate residual should be left to help prevent mass slumping and excessive erosion. Methods such as group selection, or small (less than one acre) strip clearcuts or small two-aged openings, may be appropriate for cable yarding or bench skidding on these sites.

Mechanical site preparation methods are not used frequently in the Southern Appalachian Mountains because areas of sustained gentle slopes are small and widely dispersed (USDA Forest Service 1989, p. 49-50). Not only is operation of the equipment difficult and often unsafe, mechanical site preparation methods that heavily disturb soil resources are not suitable on steep slopes where soil loss can occur. Manual and/or chemical site preparation methods may be appropriate and the only option for these sites.

GOAL 12.1 Minimize road or trail sediment that reaches streams.

Forestwide standard:

DB-VEG-2. Chopping, shearing, or soil scarification is not to be prescribed on sustained slopes greater than 35 percent or on slopes greater than 20 percent with highly erodible or failureprone soils. Mowing (e.g., shredder, Hydro Axe,) may occur on any slope where the equipment can be operated safely.

DB-VEG-3. Logging or site preparation equipment, rubber-tired or tracked, is not to be used on plastic soils when the water table is within 12 inches of the surface or when soil moisture exceeds the plastic limit. Soil moisture exceeds the plastic limit if the soil can be rolled to pencil size (approximately ¼ -inch diameter and 6 inches long) without breaking or crumbling.

Desired condition for Streamhead Seeps/Bogs and Slope Seeps: Are stable within their respective watersheds. Natural ground and surface water flows and flow patterns are allowed to control the hydrology of the system with limited influence from surface features such as roads and trails. The vegetation immediately adjacent to the seep/bog provides a mosaic of heavy to light shade and open areas. The vegetation within the seep/bog is dominated by graminoids within a matrix of sphagnum mosses and other mosses and liverworts. Vegetation within the rare community area of the watershed is conducive to providing steady, seasonally variable, water flow to the system and allows lateral light to reach portions of the seep/bog. Vegetation around upland seeps/bogs is maintained in an array of basal areas from 60-100 square feet per acre, and is influenced by regularly prescribed fire, which may at times burn through all or portions of the seep/bog. Vegetation around more sheltered seeps/bogs may or may not be fire-mediated. Non-native invasive species are not found in this community and aggressive native species are controlled.

Based on what I have read from the Forest Service's documents, I believe that this project has been planned in order to meet timber targets set by the Federal Government. The USFS is told not to talk in terms of meeting timber targets, but instead are advised to make sure that these targets are met by emphasizing the parts of the Forest Plan that rely on logging to achieve desired future conditions. This leaves the public, who clearly values the forest for much more than the number of dollars that can be swept into the US Treasury.

From: Wagner, Daniel S -FS

Sent: Wednesday, June 10, 2020 10:29 AM

To: Russell, Kelly M -FS <kelly.russell@usda.gov>; Lewis, Darryl L -FS <darryl.lewis@usda.gov>; Oxford, Angelica G -FS <angelica.oxford@usda.gov>

Subject: Just a thought on timber targets

Almost all the Forests on the call yesterday had the same story with respect to timber sales, multiple no bids, stagnant markets, and tight quotas at mills. I am sure it goes without saying, and I would presume that the staff in the RO and WO have thought about this, but with slowed market conditions, it may be wise for the Forest Service to hold all sales that do not have an immediate ecological need, that is holding sales that are not salvage sales or thinnings in high SPB risk plantations.

By continuously reducing stumpage prices on timber just to achieve a volume target for a particular year, we are getting less value per the tax payer dollar, **and less return in KV, K2, or stewardship and less NFF collections for payments to states.**

We are also competing with industry and non-industrial private land owners and potentially driving their values down in already challenging markets.

It is important for the Forest Service to achieve ecological objectives, as measured by volume targets, but perhaps those targets should be weighed on a multiyear average, with yearly volume offers based on market conditions. **It is also important for the Forest Service to continue the mission of providing forest products and supporting local economies, but must be cautious in not undercutting private industry or landowners in times of reduced public demand for forest products.**

Daniel S Wagner

Acting Ecosystems Staff Officer/Forest Silviculturist

Funding rationale in FY20 was an issue, R8 continues to be underfunded ...

The region received FY20 final funding allocation at 73% of our request, the lowest percentage of any region and with the highest target goal. In R8s response to the WO, we stated it would be challenging to achieve the target. It was always going to be difficult and the region took significant risk to distribute maximum funding to the field.

Our Region is being asked to do an immense amount of logging on our National Forest in order to meet timber targets, and are being asked to do it with less and less resources. This is what really puts this over the top for me. I know what happens when budgets are cut like this. The work done will be sloppy. It will not have the

money behind it to be thorough or careful. "Timber strike teams" is another phrase I have seen around. People whose job it is to go as fast as possible through the forest marking the timber.



**U.S. Forest Service
Southern Region
Regional Office**

August 15, 2019

Topic: Joint Southern and Eastern Region Timber Strike Team

Issue

The Forest Management staffs (FMT) of both the Southern and Eastern Regions proposes merging their Timber Strike Teams (TST) for efficiency and standardization. Currently R9 has four TSTs and R8 is proposing two new teams. There is a need to secure approval of the combined organization that has been planned. This will allow R8 FMT Staff to begin filling positions and continue with the creation of these teams in order to build efficiency and capacity for the FY20 program of work.

The Jellico project proposal is a recipe for disaster. I didn't even get to get into climate change issues... but this is what I can do for now. I feel so sick and thanks to this deadline I will probably be sick for longer than I would have. But this is nothing compared to the suffering that will be caused by all the clearcutting being proposed. People living down the mountain from the project area are looking at losing their homes and livelihoods. And having read a lot of the comments that have been submitted through the portal, I know they are very stressed about what the government is proposing to do.

I am thinking more and more that the USFS is not a safe place for any of our Public Lands. I know the park service has issues too, but maybe the National Forest needs to be put under their care. Or better yet, give it back to the Tribes for proper care.

John Hull, I am asking you to do the right thing and withdraw this proposal. The likelihood of causing harm on many levels is just too high.

Sincerely,

Tina Marie Camp Scheff