



**ROCKY MOUNTAIN  
ELK FOUNDATION**

May 10, 2024

Timothy Reed

Daniel Boone National Forest

3320 Highway 27 North

Whitley City, KY 42653

Submitted electronically via portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=63037>

Re: Jellico Vegetation Management EA

Dear District Ranger Tim Reed,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Jellico Vegetation Management Project Environmental Assessment on Daniel Boone National Forest (DBNF).

RMEF's mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. We represent more than 225,000 members nationwide with more than 2,200 members in Kentucky. Since its inception in 1984, RMEF has permanently conserved or enhanced more than 8.9 million acres of North America's most vital habitat for elk and other wildlife. RMEF and partners have completed nearly 200 conservation and hunting heritage outreach projects in Kentucky with a combined value of more than \$18.2 million. These projects conserved and enhanced nearly 64,189 acres of habitat and include efforts with state and federal agencies over the past three years to help support restored elk populations in their native range in Kentucky. In early 2022, RMEF and partners (including the DBNF) helped meet a critical goal in Kentucky elk restoration by establishing a new herd on Stearns Ranger District.

According to the Forest's 2021 Biennial Monitoring Evaluation Report, the amount of young forest providing critical early seral habitat conditions remains at less than 1% across the Forest. However, the Forest Plan itself has objectives of 5-6% young forest in 1.K Habitat Diversity Emphasis Prescription Areas and 8% young forest in Ruffed Grouse Emphasis Prescription Areas. Maintaining a biologically significant amount of young forest on the DBNF will not only decide the survival of ruffed grouse and many at-risk forest wildlife in the region, but also the sustained opportunity for the public to experience these species and maintain a conservation ethic.

Per the current Draft Jellico Vegetation Management Project EA, there is only 3.3% young forest habitat (554 acres) in the 0-30 age-class across the 16,909-acre project area. These conditions not only pose long-term threats to wildlife dependent upon young forest habitat but are in opposition to current management goals of the Forest Plan. Over 40 years, the project will create 22.2% young forest habitat (3,755 acres) across the project area. These efforts in the project area will move the Forest closer to desired forest conditions established as objectives in the Forest Plan (Objective 1.K-1.A) and benefit all forest wildlife by creating a matrix of habitat and forest-stand age diversity.

RMEF strongly supports the Proposed Action of the Jellico Vegetation Management Project and urges specific consideration to the following:

- The Jellico Project Area continues transitioning to a mature closed canopy forest that already dominates over 70% of available habitat conditions (USDA 2024). Proposed treatments will promote heterogeneity at a landscape-scale, thereby enhancing overall forest health and benefits to elk and other wildlife (Lashley et al. 2011, McCord et al. 2014, Nanney et al. 2018).
- Proposed silvicultural treatments will promote understory diversity and facilitate young forest conditions that will promote early seral habitat for elk and ruffed grouse (Nanney 2016, Whitaker et al. 2010).
- Ongoing declines in ruffed grouse over the last decade in Kentucky necessitate increased efforts to promote early seral forest conditions on the Forest (KDFWR 2017).
- Timber harvest and intermediate vegetation treatments to set back succession within mixed-hardwood forests is critical to increase forage availability and quality for elk and white-tailed deer, especially during summer (Nanney et al. 2018).
- Proposed intermediate non-commercial treatments will significantly promote regeneration and recruitment of oak species, thereby enhancing the long-term quality of forest stand products while improving habitat for hard mast-dependent wildlife (McShea et al. 2010).
- Patchily distributed timber treatments across the Jellico Project Area will support a mosaic of habitat conditions of varying successional stages and structural completeness, which will likely be most beneficial to elk (Ruprecht et al. 2023).
- Notable opposition to this EA focused on a desire to promote Old Growth conditions on the Jellico Project Area. Per Objective 1.4.B of the Forest Plan, the USFS shall maintain at least 8% of each old-growth type in patches of at least 300 acres in size. It should be noted that this objective has been exceeded on the Jellico Project Area with over 11% of available habitat identified as 1.I. Designated Old Growth.
- Proposed Actions would have no impacts to Existing, Potential, or Possible Old Growth conditions as none of these habitat designations are present in the Jellico Project Area.
- Forest Plan 1.K-Goal 1/Objective 1.A. dictates the maintenance of 5-6% within each 5<sup>th</sup> level watershed in the 0-10 age class. However, the current EA identifies only 3.3% (554 acres) young forest conditions in the **0-30** age-class across the 16,909-acre project area.
- Under the Proposed Actions, the Forest Plan objective (1.K/Objective 1.A) of 6% early seral would be achieved on year one and maintain desired 6% early seral for the next 40 years. Success of this objective will help bring DBNF into compliance with the current Forest Plan by increasing desired forest diversity and maintenance of young forest conditions.
- The construction of up to 10 miles of temporary roads to facilitate proposed harvest treatments will create linear wildlife openings while enhancing walk-in access opportunities on the Forest.
- Resulting improvements to general forage conditions for wildlife will enhance the experiences of consumptive and non-consumptive visitors to the Stearns Ranger District.
- Commercial and non-commercial timber harvests will support the renewable products economy of eastern Kentucky while generating local employment opportunities.

- RMEF supports all the Proposed Actions for the Jellico Vegetation Management Project but encourages inclusion of prescribed fire as a vegetation treatment to maintain or establish early seral habitat in areas where young forest conditions are desired.
- RMEF does not support Alternative 1 – Single Entry as a 70% (6,700 acres) decrease in the silvicultural treatment area will be woefully insufficient to adequately restore young forest conditions and early seral habitat in accordance with the Forest Plan.
- RMEF objects to Alternative 2 – No Action as this fails to meet the goals of the Forest Plan and does not align with the purpose and need of the Project.

RMEF commends Daniel Boone National Forest for use of best available science for proposed silvicultural and intermediate vegetation treatments that will help meet the goals and objectives of desired conditions for vegetation and habitat, as directed by the current Forest Plan. Successful implementation of Proposed Actions will not only promote desired future conditions of habitat diversity, but increase the overall quality of forest health, wildlife habitat, and user experiences on the Forest.

Thank you for the opportunity to comment on the draft Environmental Assessment (EA) for the Jellico Vegetation Management Project. RMEF looks forward to future collaboration with the Forest.

Sincerely,

A handwritten signature in blue ink that reads "Steven Dobey". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven Dobey  
Senior Conservation Program Manager, Eastern U.S.

## References

Kentucky Department of Fish and Wildlife Resources. 2017. Kentucky Ruffed Grouse and Young Forest Strategic Plan. Frankfort, Kentucky.

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