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USFS Jellico Vegetation Management Project #63037

Because the USFS # 63037 project has sparked many bittersweet recollections from my father, I would like to begin with a memory that is fitting.

My Father has been deceased for more years than we walked this land together. Shortly after joining my family, my wife suggested we should all take a trip to the Great Smokey Mountains. The Smokies were a favorite destination for her family. Their first trips were on unpaved roads. My Dad's response to a suggestion to visit the Smokies was, "Why in the ### do I need to go there? I have these mountains surrounding me every day and they're just as beautiful as the Smokey's." Once again, his wisdom astounds me.

Without the USFS there would be unrestricted encroachments on of our national forest. Throughout their years of existence, they have acted with what they perceived were their best methods of forest management. I assume that this Project was implemented for the betterment of the forest and not for monetary benefit of the USFS and others who would benefit from it.

This area has been treated like an inexhaustible "Piggy Bank" by mineral extractors, timber harvesters, and petroleum explorers. On more than one occasion, this area was hyped as an ideal place for a lake by damming Jellico Creek. Williamsburg, according to the proponents of the plan, would be a vacation wonderland like Lake Cumberland. Thank God it never happened! Often "experts" have recommended correcting many of these damaged lands by planting

species now considered invasive. The blight of these actions is still visible and detracts from the scenic beauty.

According to the Scenic Specialist Report (Smith 2024) "The frame of reference for measuring achievement of scenic integrity levels is the valued attributes of the "EXISTING" landscape character "BEING VIEWED". This document further states this area is within a Scenic Class 3-5 which are moderate public value for scenery. Beauty is in the eye of the beholder, whether it's art, outer space, or nature. The inhabitants, as well as many visitors, of this area cherish these vistas and fear manipulation of the forest will damage what should be preserved in perpetuity. I feel numbers cannot express the serenity, colors, shades, shapes, and the shadow of the terminator line speeding eastward at twilight. To capture the Scenic Beauty of this area and specifically Jellico and Ryans Creek, it would need to be viewed through the eyes of each beholder. A scientific impossibility.

Scenic beauty is a contributor to the socioeconomic viability for this area. This October, the 31st Gateway to The Cumberland's 2024 Jeep Jamboree will visit. This should be near the peak fall colors. In addition to the scenic beauty, this event will inject thousands of dollars into the local community. Jeep Jamboree, in discussing this their website states, "The majestic Cumberland Mountains are a fitting backdrop for this Jamboree." This area has tremendous opportunities for recreational development. Unfortunately, the focus has long been on extraction of natural resources instead of marketing its natural beauty.

According to socioeconomic analysis (Fitzsimmons 2024) McCreary County depends heavily on federal jobs (29%) compared to Whitley county's dependence on Federal jobs (13%). Federal land

ownership in McCreary County is 63% compared to Whitley's Federal land ownership of 16%. Yet, Whitley has 4% more travel and tourism private employment than McCreary County.

I believe this is an indicator of Whitley's untapped potential for tourism in the area. Whitley is already accomplishing this to some degree using private employment.

If the Proposed Plan is implemented, I think this will result in a 40 year trickle effect from an economic standpoint. Conversely, Alternative 1, although drastically shorter, should be more financially beneficial for the USFS and the community. Which would be more desirable? An allowance of \$100 a week for 40 years or an outright payment of \$208,000. Also, the 40-year plan would allow for too many changes regarding forestry science, economics, USFS personnel, as well as political and legal challenges.

Alternative 1 will permit the stakeholders a better understanding of how the USFS takes care of our National Forest. Those responsible for the actions taken with this plan will be around to see it come to fruition. Good or bad. Conversely, the citizens who recommended USFS adopt Alternative 1 instead of the Proposed Action, including me, hopefully, will be here to judge our decision.

Alternative 2, from my perspective, is my preferred action. Although this lacks the expected monetary income from the original plan and Alternative 1, it also has limited requirements from the USFS. As in all business ventures it's Risk vs Rewards. Both the Proposed Action and Alternative 1 have what I consider some serious hydrological issues.

According to the hydrologist report the science used in this evaluation (WEPP) has an accuracy of +/-50% (Cherry 2024). The Proposed Action, without a buffer zone, will discharge 1,838,343 pounds of sediment each year for 40 years into the watershed. That's almost 3.7 million tons of sediment. That is a lot of Whitley and McCreary County down the drain.

Alternative 1, without a buffer zone, is projected to discharge 7,090,332 pounds of sediment each year into the watershed. That's a total discharge of 10.6 thousand tons over 3 years. Alternative 1 will discharge 5 million more pounds of sediment each year because of the increased number of skid roads and skid trails compared to Proposed Action.

I am concerned that the sediment discharge will result in degradation of stream habitat in the watershed and cause herbicide dispersant issues. Once again, I would choose Alternative 2 as best option. However, this option does not address the sediment discharge that is presently occurring at baseline. That amount is 279,944 pounds annually. If this is not corrected, approximately 5.6 thousand tons will be discharged into the watershed over the next 40 years. Regarding hydrological issues, I would elect Alternative 1 over the Proposed Action for its long-term reduction in sediment discharge and hope this area does not experience an excessive wet period. Which would contribute to other soil issues.

The area where this proposed logging is planned has some plastic soil composition as well as severe erosion hazards (Cotton 2024). As stated in this article, Alternative 1 has more soil area issues due to the accelerated schedule for timber extraction. Here again, Alternative 2 would be preferred. However, if Proposed Action and

Alternative 1 are the only choices, I would choose Alternative 1 and hope we have a dry climate situation during the logging event.

I am amazed at the number of plants and animals in the DBNF. The information included in the Biological Evaluation and Specialist's Report was overwhelming. I had no idea that so many living creatures have been documented in the DBNF (Metzmeier and Taylor 2024). This 118-page document has numerous tables annotating plant and animals that were unknown to me. My fear is both the Proposed Action and Alternative 1 option will inadvertently destroy something we may never discover until it's too late.

Alternative 2, with the least amount of disturbance, provides a haven to aid in their survival. Under the **Species Habitat or Likely Occurrence documentation** many groups have the notation, "habitat not present in project action area." I suppose groups listed as such will respect the border of the action area and refrain from entering.

The information about nonnative species does not include Kudzu or Japanese knotweed. Disturbance of any type will propagate all the nonnative plants and will undoubtedly outpace any effort to control same.

The existing acres by age class shown in figure 3 of the Vegetation Report shows a total acreage of trees between 81 and 131+ years old to be 12,273 acres. The age group of 31 to 80 year old timber constitutes 4,082 acres (Hull 2024). If we harvest 81-130 age group, timber how would we maintain the 131+ part of our forest? I don't support harvesting any portion of what's considered old growth forest. Regarding present forest management practices, I wonder how the native forest around the world survived without human

intervention. If Alternative 2 is chosen, we may learn how well the forest survives when left alone.

Conclusion:

I appreciate the dedication of the USFS employees who have labored to produce all seven supporting documents. I have studied all of these documents and plan to study them further. In my comments from 2022, USFS responded to seven of my concerns. One of those comments mentioned a third party with no affiliation to the USDA/USFS should be the examining agency. Upon reviewing these supporting documents, I find the majority are employed by USDA/USFS. Although I am sure those individuals are considered experts in their field and conscientious, I take issue with all support documents originating from the USDA/USFS. There is a logical reason why airlines, railroads, pipelines, and barge companies are not permitted to investigate their own accidents. That is the purview of the NTSB, FAA, FRA and other agencies. Would you like to fly on an airliner that's allowed to do its own accident investigation? Well, regardless of how thorough the USFS's due diligence has been, I would be more at ease if a neutral authority evaluated and/or participated in these findings. A signature was missing on all supporting USFS documents. This would have made it more personal.

Thanks to those who will read and process all these many comments and please excuse my rambling.