Data Submitted (UTC 11): 5/17/2024 4:00:00 AM First name: Deborah Last name: Moses Organization:

Title:

Comments: I want to offer my sincere appreciation for the work that has been done in order to present Alternative 1 for the public's consideration. The reduction of total acres proposed to be logged in Alternative 1, alongwith Alternative 1's elimination of the clear-cut method from the original proposal, shows that the comments presented to your agency indeed made a difference. However, I still have deep concerns withseveral aspects of Alternative 1. The fact that the total impacted acreage is significantly reduced is definitely a selling point for Alternative 1, but the accelerated schedule concerns me, primarily with respect to the hydrology and sedimentology consequences. Other concerns include, slope stability, use of herbicides, the impact onendangered and threatened species of plant and animal life, and overall forestry stewardship.Hydrology/Sedimentology - In the Hydrology Effects Analysis Report, prepared my Mac Cherry(4/11/2004) an overall determination of the impacts of logging on the project area in Alternative 1shows an overall increase in the sediment load anywhere between 2.8 and 8.7 times the baselineamount only for skid trails, skid roads, and temporary roads. It doesn't appear that any consideration isgiven to the long-term post-logging effects stump and root degradation and soil instability associated therewith. Moreover, the HUC12 watershed and the assumptions made for the modeling might not trulyrepresent field conditions in smaller sub-watersheds, such as for Jackson Creek in southern WhitleyCounty, where my property is located. An increase in the sediment load for this area, over an extended period of time, would likely cause the stream bed to fill with sediment and turn my property into aswamp. It is not clear to me whether an average runoff value was used for the entire project, but thesteepness of the mountains above Jackson Creek, could possibly cause a higher sediment load than thenumbers shown in the report. I am requesting that alternate sediment control, such as sediment fence, straw bales, or similar measures, be considered in areas being logged above my property.Additionally, the report states on Page 3, "A stream in the project area, Ryan's Creek, is on Kentucky's303(d) list and the pollutants are total suspended solids and pH[hellip]". And subsequently says, "Research inKentucky on timber harvesting and water quality showed streamwater pH was not affected by timberharvesting (Arthur et al., 1998), so impacts from the Project actions are not expected to contribute toRyans Creek impairment". Although the 303(d) list shows two sources of pollutants (pH and totalsuspended solids), no mention is made of the effect that the increase in the sediment load would haveon the total suspended solids. No logging operation should be allowed to contribute to further degradation of Ryans Creek. Slope Stability - Some of the steepest slopes in the Daniel Boone National Forest (DBNF) lie within theproposed logging area. A slide has occurred on my property within the past decade or so, with nooutside influences such as logging or mining. The entire proposed project area lies in close proximity toboth the Pine Mountain Thrust Fault and the Rockcastle River Fault system. For these reasons, intensivestability analyses including seismic influences should be run on the areas proposed for logging. In the document, Jellico Vegetation Management Plan Project Soil Effects Analysis, prepared by Dr.Claudia Cotton (4/4/2024), Dr. Cotton mentions reported slide areas that were not confirmed. I amconfused as to whether this means someone visited the site and didn't find a slide or if nobody visitedthe site. Anyone is welcome to visit my slide. Also, in the aforementioned report, I did not see where any consideration was given to the long-termeffects on slope stability as a result of the degradation of stumps and root systems. I feel that this is anoversight and should be considered. I disagree with the author's belief (as I understand it) that heavyequipment is the main concern for the cause of slides.Herbicides - The main concern I have with the proposed herbicides is that we have NO CLUE what thoseherbicides are. The runoff associated with herbicides will impact streams and soils below proposedlogging areas. Livestock, crops, and bees, just to mention a few local industries could be adverselyimpacted by use of herbicides. Threatened/Endangered Species - Within the proposed project area in McCreary and Whitley counties, a great many threatened and/or endangered species can be found. The mountains, valleys, and streamsprovide a rich diversity of species found on state endangered/threatened lists for this purpose of identifying areas in which preventative measures must be taken to ensure protection of these species. Mammals, plants, fish, and mussels listed include, but may not be limited to the following:Blackside Dace (fish)Palezone Shiner (fish)Cumberland Darter (fish)Cumberland Arrow Darter (fish)Indiana Bat (mammal)Cumberland Bean (mussel)Cumberland Elktoe (mussel)More detailed studies

regarding increased sediment loads and the effect of herbicides dissimilated intosoils should be considered before any logging should be done on the proposed project area. Overall Forestry Stewardship - To engage in a logging project of this magnitude without consideration f creating something of value for residents and visitors to the region at the end of the project is a greatoversight. It is duly noted that plans such as this were beyond the scope of this proposed project, butshould they be? If you plan to replace culverts, improve roads and stream crossings, and make otherrepairs, would it take much more effort to create a few campsites or mountain bike trails? Moreover, leaving revegetation to naturally occurring species invites a takeover of invasive species, such as autumnolive trees and trees of heaven. I seriously doubt that these nuisance plants can be controlled by theproposed methods in the EA[hellip]the unnamed herbicides[hellip]Again, I appreciate the willingness of representatives of the USFS to meet with us, communicate with us, and be cordial to us during this process. I do not love Alternative 1, but it appears to be a lot morepalatable than the Proposed Action. Thank you for the opportunity to comment on the draft.Deborah B. Moses, PE, PLS