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Organization: Kentucky Department of Fish and Wildlife Resources

Title:

Comments: Attached comment letter submitted on behalf on Ben Robinson, Director of the Wildlife Division, Kentucky Department of Fish and Wildlife Resources.

May 20, 2024
Mr. Tim Reed
District Ranger
US Forest Service
3320 Highway 27 North
Whitley City, KY 42653
#1 Sportsman's Lane
Frankfort, Kentucky 40601
Phone (502) 564-3400
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RE: Jellico Vegetation Management Project
Mr. Reed, The Kentucky Department of Fish and Wildlife Resources (KDFWR) Wildlife Division is writing this letter in support of the USDA Forest Service's Proposed Action for the Jellico Vegetation Management Project. Having reviewed the Draft Jellico Vegetation Management Project Environmental Assessment (EA), KDFWR affirms that the forest management activities planned under the EA's Proposed Action align with the KDFWR's core mission - to conserve and enhance fish and wildlife resources and provide opportunity for hunting, fishing, trapping, boating and other wildlife related activities. Moreover, the Proposed Action aligns with KDFWR's State Wildlife Action Plan (SWAP), which identifies Species of Greatest Conservation Need (SGCN), associated conservation strategies, and Conservation Opportunity Areas (COAs). The South Fork COA, which encompasses the Jellico Project Area, harbors 167 SGCN, the majority of which are birds (55), freshwater mussels (30), and plants (22). Although Forest Service ownership provides all SGCN with permanent protection from development (particularly mussels and fishes), vegetation management will be needed to improve populations of many SGCN bird species. The Jellico Project Area offers a tremendous opportunity to accomplish this because it directly addresses one overarching conservation strategy identified in the SWAP, along with KDFWR's Strategic Plans for Elk and Ruffed Grouse, which is increasing forest structural and vegetative diversity. The variety of proposed silvicultural activities planned under the Proposed Action directly address multiple facets of structural and vegetation diversity. Regeneration techniques (clearcut and two-aged shelterwood) are the most practical and efficient means of increasing early seral habitat for ruffed grouse, American woodcock, and eastern whip-poor-will. Intermediate treatments (crop tree release and midstory removal) are necessary to retain oak in future forest stands given trends toward mesophytic forest types, and oak is a keystone species for many taxa. Treating aggressive invasive species, which the Proposed Action also includes, will be crucial to ensuring desired conditions are met. Just as importantly, the Proposed Action will increase the pace and scale of habitat diversification and will maintain that diversity through time. In contrast, Alternative 1 falls short in terms of the spatial and temporal scale needed for conservation of SGCN species, whereas the No-Action Alternative ignores such considerations altogether. Furthermore, the Proposed Action has been planned by a multidisciplinary team of professional natural resource and recreation managers serving the public interest rather than economic gain. Thus, considering the habitat needs of many wildlife species and recreational opportunities for our constituents, we reiterate our support for the Proposed Action. In closing, KDFWR appreciates the opportunity to provide comments on the Jellico Vegetation Management Project. We support the Proposed Action in terms of the wildlife species and constituents for which we work each day. We look forward to the implementation of these beneficial practices. Thank you, Ben A. Robinson, Director of Wildlife