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Comments: Sierra Club, Kentucky Chapter is opposed to the proposed Jellico Vegetation Management Project #63037. A 10,000 acre plan spanning 40 years is not manageable. The planners today will be long gone over 40 years and the project fails to account for emerging needs, long range ecological concerns and new silviculture knowledge and techniques that will certainly be developed. We prefer the No Action Alternative at this time with explicit attention to Tree of Heaven (Ailanthus) eradication as routine maintenance. We recommend preparing a complete environmental impact statement with strict attention to impacts on water and aquatic ecosystems, forest habitat, careful identification of old growth and near old growth stands, and identification of slopes that must be avoided before any vegetation management project is finalized.

It is imperative that we preserve old growth forest habitat. In Keller et al, 2023 (attached), the authors challenge the current thinking that early seral habitat must be expanded to promote a healthy forest. In contrast the authors suggest four steps for a more "natural" and less costly approach including a recommendation to, "Strengthen the protection of GAP 3 "multiple-use" public lands such as national forests, to maintain natural ecosystems, carbon storage, and public access to green spaces to the extent possible. This includes avoiding intensive resource extraction that destroys or permanently impairs the integrity and productivity of natural systems."

Much attention has been given to the serious global biodiversity crisis. In the United States, bird populations have plummeted over the last 50 years due primarily to land use change and habitat loss. 10,000 acres is a huge area and we cannot afford to unnecessarily convert that much mature and old growth habitat to early seral habitat.

The Daniel Boone National Forest (DBNF) is public land that is managed for multiple uses. We prefer, and we believe the public prefers, recreation, hunting, fishing, hiking, and enjoying nature over huge, destructive, and unnecessary logging activities. The DBNF is not a timber company, yet with massive increases in logging activity over the last 2 decades and employee evaluations based in part on timber harvest targets, it appears that timber revenue has become a priority. Please slow down. We don't want our forest to be sold off to the highest bidder.

Finally, in a better plan we would like to see smaller, targeted areas of clear cuts and shelterwood activities, conservation of old growth stands, and more commercial thinning whenever possible. With a more targeted approach, habitat can be managed for species that need canopy openings, without massive cuts and cuts on steep slopes that create flood and landslide risks. Sierra Club, Kentucky Chapter is FOR appropriate resource management in the DBNF but we want the forest service to manage for habitat, fire prevention, and SUSTAINABLE extraction of our renewable forest products.

Terrell Holder, Chair

Sierra Club, Kentucky Chapter