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Comments: Please see the attached letter. Thank you for giving us the opportunity to comment.

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May 24, 2022My wife Theresa and I live on 350 acres at the head of Little Wolf Creek, in the eastern section of the Jellico Mountains project area. We share 2.5 miles of boundary with the Daniel Boone National Forest, including along the project area to be logged. We have a small farm with free-range ducks, chickens, and honey bees that all depend on our ponds and creeks. We have lived on Little Wolf Creek for 12 years, owned the property for 20, and lived in Kentucky more than half our lives. The peace, quiet, and natural beauty drew us here to the Jellico Mountains of southern Kentucky.My recommendation to the U.S. Forest Service Stearns District is to implement the compromise Alternative 1 logging plan in the Jellico Vegetation Management Project #63037.A 6-year project length in Alternative 1 is much better than the 40 years in the Proposed Action. 3,000 total acres logged is better than 9,600 acres. And eliminating two of the worst clearcut types is better than clearcutting over 5,000 acres, more than a quarter of the national forest in the Jellico Mountains, as prescribed by the Proposed Action in the Draft Environmental Assessment (EA).In my opinion, the Jellico Mountains could benefit from some forest management, including invasive species treatments, opening up forest canopies to young growth, and providing diverse habitats and cover for various wildlife and plants.However, clearcutting the steep slopes of the Jellico Mountains will bring landslides, sediment in our creeks and drinking water, even worse flooding than what we[rsquo]ve seen the past few years, plus plenty of room for invasives to grow. And since most of the slopes are too steep for bushhogging, the only solution is herbicides, and one needs lots of toxic chemicals to control all the Autumn Olive, Tree of Heaven, dangerous Water Hemlock, Japanese Knotweed, Kudzu, Multiflora Rose, Johnson Grass, and more that grow in every open field around here, as every Kentucky landowner knows.The smaller 6-year project in Alternative 1 would give the community a chance to evaluate the logging work and its impact on people and property, homes and farms, livestock and wildlife, water quality and quality of life, noise and pollution, invasive species, etc. The Forest Service is likely to propose another logging project in 2030, but hopefully under an updated Forest Plan with updated science, and input from a community with 6 years of logging experience under our belt.I[rsquo]d like to thank the U.S. Forest Service (USFS), Stearns District, Ranger Tim Reed, and Project Leader John Hull for truly listening to the community[rsquo]s concerns and providing legitimate Alternatives 1 and 2. I also thank them for meeting with us when needed, answering our many questions as best they can, and providing us with maps to share with the community. We look forward to partnering with Mr. Reed, Mr. Hull, and the Forest Service to bring more recreation and preservation and less clearcutting to the beautiful Jellico Mountains.The new EA Proposed Action is about the same as the 2022 Scoping Period Proposed Action, less 177 acres of mature forest (thank you), but increasing effective clearcut to 5,170 acres (no thank you). Therefore, I hold most of the same concerns about the EA Proposed Action as I listed in my official comments of December 2022, so in deference to our friends at the Forest Service, I won[rsquo]t repeat all those concerns again here. Following are my new issues and questions. I[rsquo]ll try to keep this brief.TIMBER TARGETSI was troubled when I read the lawsuit filed by the Southern Environmental Law Center (SELC) against the U.S. Forest Service. The lawsuit alleges, [ldquo]Each year, the Forest Service and Department of Agriculture set timber targets, which the Forest Service is required to meet through logging on public lands across the country. In recent years, the national target has been set as high as 4 billion board feet [ndash] or enough lumber to circle the globe more than 30 times. The Forest Service itself has said that the amount of timber sold from our national forests in recent years has been [lsquo]higher than any period in the previous few decades.[rsquo] Even more concerning, the Forest Service recently announced plans to increase the already high targets in the coming years, particularly in the South and East.[rdquo] ((1))For example, a Forest Service document titled [ldquo]Daniel Boone NF Timber Sale Schedule Expectations[rdquo] includes volumes and acreages expected by the District from 2017 through 2026, and says, [ldquo]PERFORMANCE [ndash] This schedule is used as a performance element for line officers, IDT members, and others.[rdquo] ((2))Kentucky

Heartwood said in its analysis, [ldquo]Considering this information, it is no surprise that the Jellico proposal is so aggressive. It is clear that the DBNF is operating under an accelerated timber program with harvest volume quotas tied directly to job performance reviews. This skews the ability of the agency to formulate, analyze, and modify any timber harvest proposal for the Jellico project area in a manner that responds to community or environmental concerns.[rdquo] ((2))In a free market economy like America, it[rsquo]s common for employee pay to be tied in some way to performance. It is my understanding that additional Freedom of Information Act (FOIA) requests have been filed to see if this is the case with the Forest Service more broadly. With all due respect, I feel the need to ask the following questions, but I totally understand if you must reply [ldquo]no comment[rdquo] because of ongoing litigation.Question 1> Are performance reviews for any USFS Jellico Mountains project members tied in any way to timber targets?Question 2> Is compensation for any USFS Jellico Mountains project members tied in any way to timber targets? I[rsquo]m not looking for absolute numbers. Whatever you[rsquo]re paid is probably much less than you[rsquo]d rightly earn in the private sector, so thank you for your government service. Just yes/no, and if yes, what percentage of total employee compensation do the timber targets represent?Question 3> Are performance reviews tied to any other tangible measures, such as acres of old growth and mature forest preserved, or number of recreational opportunities developed, etc.?PROJECT LENGTHAs a long-range thinker myself, I can appreciate the Forest Service laying out a 40-year plan to manage the Jellico Mountains and get our forest back under control after decades of allowing invasive species to flourish, especially Tree of Heaven, which brings the Spotted Lantern Fly. And I[rsquo]m OK with the Forest Service sharing their long-range vision with the public. But in my opinion, it[rsquo]s wrong to grant the Forest Service a mandate to clearcut our Jellico Mountains for the next 40 years through the year 2064. Science will continue to advance rapidly over the next 40 years, especially in terms of AI, robotics, and our understanding of climate change and forest management. In 40 years, every member of the USFS Jellico Mountains project team will have likely moved on in their careers, decades prior. Many of the residents (including my wife and me) will likely pass away before this project even ends, meaning we will have to ensure this massive logging project in our mountains for the entire rest of our lives!A four decade-long project will also deny our children, grandchildren, and great-grandchildren the right to comment on how THEIR forests should be managed. The intent of the NEPA process is to invite public participation. A 40-year project seems to purposefully avoid this.Question 4> Has the Forest Service proposed and/or implemented other logging projects in the United States lasting 40 years or longer?Recommendation 1> If the Proposed Action is selected, the project length should be reduced to 10-15 years or less, with a pro-rated reduction in acres logged.OUTDATED FOREST PLANThe USFS released its [ldquo]Revised Forest Plan for the Daniel Boone National Forest[rdquo] in 2004. ((3)) That was two years before Al Gore released [ldquo]An Inconvenient Truth,[rdquo] the movie that launched global awareness of climate change. Since then, we[rsquo]ve gained a wealth of scientific knowledge on climate change, forestry, biology, hydrology, and everything else.The Forest Plan itself is supposed to be updated frequently to keep up with science, politics, and public opinion. [ldquo]For the next 10 to 15 years, the 2004 Forest Plan will guide coordination of multiple uses (such as outdoor recreation, minerals, timber, watersheds, fish and wildlife, and wilderness, etc.) and promote sustained yields of products and services on the DBNF.[rdquo] Also, [ldquo]the National Forest Management Act of 1976 (NFMA) requires that each national forest develop a Land and Resource Management Plan that is revised every 10 to 15 years, or when conditions change significantly.[rdquo] ((3))The Forest Service responded to our concern by saying, [ldquo]The most current and relevant science will be used in the analysis of this project. The date of release for the next Daniel Boone Forest Plan is beyond the scope of this project.[rdquo] ((4))Recommendation 2> Commit in writing to re-evaluating the Jellico Mountains logging project if/when the next Daniel Boone Forest Plan is officially released, to ensure the project is in compliance with the new forest plan.LATEST SCIENCEMr. Reed has stated that while a project may get underway using data from a dated forest management plan, that does not mean that any revised future plans will simply be ignored. [ldquo]What[rsquo]s being proposed is what is in line with our forest plan,[rdquo] Reed clarified. [ldquo]A big part of our job is implementing those plans. Anytime that a forest plan is revised, however, if there is something in there that would change a project, we would take that into account[hellip] Making a long-term decision now does not mean that you[rsquo]ll always be locked into certain parameters. If something needs to change, then we will make those changes, so that idea of using outdated data is a little misleading.[rdquo] ((5))Question 5> What Forest Service process(es) in the Daniel Boone Forest Plan or elsewhere would require a

re-examination of the Jellico Mountains logging project while it[rsquo]s ongoing?Question 6> What Forest Service process(es) would require a re-solicitation of public input for the 40-year Proposed Action while it[rsquo]s ongoing? Has this ever happened?3D MAPSTwo-dimensional maps are useful, but they can be misleading when trying to visualize the effect of logging on steep, mountainous terrain like the Jellico Mountains. A logging tract nearby on the map might not even be visible because it[rsquo]s on the other side of a mountain ridge, whereas a more distant logging tract might loom prominently in a resident[rsquo]s view. Thus, we created a comprehensive set of detailed three-dimensional maps that bring to life the large, flat USFS project area map. ((6)) Many residents told us they appreciated these maps to better understand the impact of the proposed project on their holler.The third dimension also adds another layer when evaluating logging projects. A trained cartologist can look at the elevation gradient on a 2D map and imagine the slope. But most people respond better to lifelike 3D models that help them imagine what logging will look like from their perspective on the mountains they see every day. 3D also highlights some of the more questionable decisions, such as to clearcut steep slopes facing residential neighborhoods.In my 2022 comments, I recommended the Forest Service should post the map KML and shapefiles on their project website. To which the Forest Service replied, [ldquo]Maps are created to inform the decision maker, and the type of map created varies by project. All shapefiles are available in the public record, and can be obtained through the FOIA process.[rdquo] ((7)) The average processing time in 2023 for FOIA requests to the USFS are [ldquo]78 working days for simple requests, 219 working days for complex requests.[rdquo] ((8)) Since the comment periods in the NEPA process last only 30[ndash]45 elapsed days ((9)), citizens will likely never have access to 3D maps in time to use when evaluating the logging project and submitting their official comments. That is, unless someone like me spends 10+ hours converting the massive 2D Forest Service map by hand into a set of 3D maps. Safe to say, most people won[rsquo]t do that.Recommendation 3> Please just share the map shapefiles along with the rest of the project materials on the project website. Don[rsquo]t make us FOIA.HERBICIDESMy wife Theresa is a professional beekeeper and just the second female Master Beekeeper in the state of Kentucky! She maintains about a dozen honey bee hives, spread out across our farm, plus other remote hives in Whitley County. Amazingly, after six years of beekeeping, Theresa has maintained a 99% hive survival rate by using the latest science, paying close attention and providing ongoing care to her hives, focusing on Varroa destructor integrated pest management (IPM), using organic treatments, insulating hives in winter, and monitoring the temperature of her hives with Bluetooth devices.Theresa[rsquo]s honeybees and other pollinators may be harmed by your use of herbicides. Theresa will be closely monitoring the health of her bees after the logging and herbicide use begins. In our 2022 comments, I asked, [ldquo]Will the USFS notify nearby residents when herbicide treatments begin?[rdquo]The Forest Service replied, [ldquo]No; however, the Forest Service is required to post [lsquo]NOTICE[rsquo] signs in all areas where herbicide treatments occur. Signs are posted before application begins and include the date, general location, contact information, and the herbicide(s) applied. Signs stay posted for a minimum of two weeks following treatment.[rdquo] ((10))There are two problems with this. First, the Jellico Mountains project area is huge[mdash]more than 30 square miles. And the way forest access roads work, I could hike 1,000 feet up to the Forest Service road behind our house (in about 40 minutes) faster than I could drive to it (in about 50 minutes, because we have to drive all the way out to Williamsburg, past Walmart on KY-92 to Jellico Creek, all the way down Jellico Creek Road, then up the slow Wolf Knob mountain road). Which means, in all practicality, we[rsquo]ll never see the herbicide treatment signs.Second problem is, honey bees have a wide range. A worker bee flies up to 2 miles in any direction to forage for nectar and pollen. Two miles in any direction is a large area of 12.5 square miles. ((11)) This means Theresa[rsquo]s honey bees will fly into the Jellico Mountains project area where the Forest Service has deployed herbicides. Honey bees and pollinators are in peril, and while some herbicides are sublethal alone, in combination with other stressors, herbicides contribute to colony death. This area is fairly free of pesticide application because it lacks significant agriculture or homeowner application. Therefore, Forest Service spraying will be a major contributor to pesticides in this relatively pristine environment.Recommendation 4> When you have to put up signs for herbicide treatment, please also post this treatment information on your Jellico Mountains project website and/or Facebook page to inform the public.INVASIVE SPECIESAs any southern Kentucky landowner will tell you, when you bushhog or clearcut a field, you have two winters to clear it again. If you miss that short window, after the third summer, you will need a bulldozer to remove all the Autumn Olive and Tree of Heaven.A logging operation can involve dozens of vehicles

making hundreds of trips over weeks or years to a remote area. Vehicles, workers, wildlife, and birds can transport seeds of non-native plants into logged forests, where the reduction of canopy and newly disturbed soils allow invasive species to take root and outcompete native species.The Forest Service didn[rsquo]t do a very good job of keeping invasives out the last time they logged the Jellico Mountains in the 1990s. In 2022, we toured many of the logged areas with a professional logger who performed some of the logging, and many of these areas were infested with Tree of Heaven, especially along the road, where it[rsquo]s actually easiest to treat.Tree of Heaven [ldquo]produces an overly abundant amount of seeds, crowds out native species with its dense thickets and secretes a chemical into the soil that is toxic to surrounding plants[hellip] Its aggressive root system can cause damage to pavement, sewers and building foundations. The tree has also helpedadvance the spread of the spotted lanternfly, an invasive insect [hellip] [that] feeds on and damages many species of native and fruit-bearing trees.[rdquo] ((12))Question 7> Given that the Forest Service wasn[rsquo]t successful in the 1990s controlling invasive species, why do you believe the Forest Service will succeed this time, especially with many thousands of acres being effectively clearcut in the Proposed Action?RUFFED GROUSE[ldquo]Ruffed Grouse (Bonasa umbellus) are the most widely distributed resident game bird in North America, living now or recently in all the Canadian Provinces and in 38 of the 49 states on the continent.[rdquo] ((13)) Ruffed Grouse are not endangered by any means, though their range is limited to the colder areas of the country, and the Appalachians represent the southernmost range. This means the Ruffed Grouse range will continue to push northward as the climate warms.[ldquo]By far the major portion of the Ruffed Grouse range and population is in regions where snow is an important part of the winter scene and consistently covers the ground from late November to late March, early April or later.[rdquo] ((13)) This does not describe the Jellico Mountains. We have occasional winter snows, but snow rarely lasts more than a few days, except maybe during a bitter cold week or two in January or February.And here is their justification for clearcutting the Jellico Mountains: Ruffed Grouse [ldquo]thrive best where forests are kept young and vigorous by occasional clear-cut logging, or fire, and gradually diminish in numbers as forests mature and their critical food and cover resources deteriorate in the shade of a climax forest. Since the quality of grouse cover declines 15-20 years following disturbance, repeated disturbance (e.g., intensive harvests) is absolutely critical for the long-term persistence of grouse in an area.[rdquo] ((13)) [ldquo]Across much of the Ruffed Grouse range, there are usually mature male aspens within sight in the forest canopy overhead.[rdquo] ((13)) However, aspens don[rsquo]t even reach as far south as the state of Kentucky. ((14))Also note, the Ruffed Grouse Society (RGS) & American Woodcock Society (AWS) have deep ties with the Forest Service. RGS & AWS [ldquo]signed a stewardship agreement in 2022 with the USFS on the Daniel Boone National Forest in Kentucky to assist with implementation of the Little Flat Creek Stewardship Project,[rdquo] with its stated goal to clear 15% of the forest. ((15)) In September 2023, the RGS & AWS [ldquo]entered into its latest agreement[rdquo] with the USFS [ldquo]to support forest management and implement on-the-ground habitat improvements on nearly 6,000 acres across four iconic American national forests from Minnesota to Vermont.[rdquo] We[rsquo]re talking a lot of money here. [ldquo]With more than $2 million committed by the Forest Service and over $440,000 of matching funds negotiated by the RGS & AWS national office, this is the largest dollar value attached to any of the organization[rsquo]s more than 20 stewardship agreements thus far.[rdquo] ((16))Question 8> How much emphasis does the Forest Service place on the [ldquo]most widely distributed game bird in North America[rdquo] that doesn[rsquo]t prefer our warm snowless winters or our non-Aspen forests, in your decision to clearcut the Jellico Mountains, in part, for this same bird?Question 9> Isn[rsquo]t it a conflict of interest for the USFS to grant millions of dollars to the RGS & AWS, and then for the RGS & AWS to completely support USFS logging projects?SOCIOECONOMICSThe Socioeconomic Analysis for the Jellico Mountains project indicates the Proposed Action would lose money ($-710,321.33 in Net Present Value), and Alternative 1 would make money ($1,356,521.60 in NPV). ((17))The analysis explains all the costs to the community of NOT logging, i.e., choosing Alternative 2: [ldquo]This alternative would not provide local county governments, industry, or the local populace with positive financial benefits[hellip] Failure to treat vegetation in this area could lead to costs in the future and the potential loss of jobs from the closing of forest management businesses in the area as well as loss of income to the local community from the closing of these businesses. These costs would be associated with primarily non-monetary costs to societal values, such as forest health, public safety, and visual quality. Additionally, potential exists for increased fire suppression costs, potential loss of private property, and decreased road maintenance

due to monetary prioritization.[rdquo] ((17))However, the analysis completely ignores the costs of doing the project: loss of mature forests; reduction in visual quality; noise in our quiet hollers; logging trucks and equipment going up and down our narrow, twisty mountain roads for 40 years, endangering our children and animals, and requiring additional road maintenance; decades-long reduction in total carbon sequestration; sediment in our creeks, clogging of our irrigation systems, and potentially tainting Williamsburg[rsquo]s drinking water supply; increased flooding in our creeks; landslides and the associated debris; increased invasive species; herbicide harming our honey bees and polluting our creeks; reduction in recreational value; and an increase in stress and a reduction in quality of life for local residents.The analysis also ignores the benefits of not logging the Jellico Mountains: more mature forests; less noise, traffic, and pollution; no extra flooding, erosion, or landslides; clearer creeks and cleaner drinking water for Williamsburg; no herbicides and reduced invasive species, etc.Recommendation 5> The socioeconomic report should mention all these costs and perhaps try to quantify some of them.Question 10> How do the Payment in Lieu of Taxes, County Distribution, RACs Distribution, and Local School Districts Distribution totals compare to what Whitley and McCreary counties could collect in property taxes? For example, in the 2023 Whitley County Property Tax bill, agricultural land was taxed at a rate of 0.746 per $100. Vacant land around here is valued at around $1,000-$3,000 per acre for larger parcels, so that[rsquo]s about 7[ndash]21 cents property tax revenue per acre per year.RECREATIONIn our 2022 comments, many of us asked for more recreation in the Jellico Mountains. The Forest Service replied, [ldquo]The current and potential future development of tourism are outside the scope of the project.[rdquo] ((18)) Having managed many large projects throughout my career, I can appreciate the Forest Service[rsquo]s desire to avoid scope creep and remain focused on forest treatments. However, it would[rsquo]ve been nice if you had directed citizens to where they can request recreational projects in the national forest.In March 2023, our community presented the Stearns District with a [ldquo]Citizens Alternative[rdquo] to their proposed logging project. One of the points asked for more recreation: [ldquo]6. FOCUS ON RECREATION INSTEAD OF EXTRACTION. Build hiking and equestrian trails; create vistas, pullouts, and parking spots; construct campgrounds, remote campsites, cabins, and someday a lodge; maintain streams and fishing ponds for public use. Conduct a feasibility study to create a National Recreation Area or National Monument in the Jellico Mountains managed by the U.S. Forest Service.[rdquo] ((19)) I added further detail to this idea by creating a vision for a Jellico Mountains Recreation Area (JMRA) on public and private lands in Whitley and McCreary counties. ((20))Mr. Reed replied that he has a large recreational project in his career background and that he would [ldquo]welcome[rdquo] a recreation project landing on his desk. He told us that he is not responsible for creating new recreation projects, as they must come from Forest Service leadership. He reminded us that a National Monument or National Recreation Area designation requires an act of Congress and the President.We look forward to working with the Forest Service, Mr. Reed, Mr. Hull, and our local, state, and federal legislators to help bring recreational opportunities to the Jellico Mountains.REFERENCES((1)) Southern Environmental Law Center, [ldquo]Groundbreaking lawsuit takes aim at U.S. Forest Service[rsquo]s [lsquo]timber targets,[rsquo][rdquo] 2/29/2024. https://www.southernenvironment.org/news/groundbreaking-lawsuit-takes-aim-at-u-s-forest-services-timber-targets/((2)) Kentucky Heartwood, 2024. https://kyheartwood.org/public-comments/jellico-comment-period((3)) U.S. Forest Service, [ldquo]Forest Plan,[rdquo] 2004. https://www.fs.usda.gov/detail/dbnf/landmanagement/planning/?cid=fseprd1005077((4)) U.S. Forest Service, Comment #102, [ldquo]Jellico Scoping Comments Nov.-Dec. 5th 2022,[rdquo] 2023. 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