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Comments: I oppose three of the five types of timber harvest described in the Project.

Specifically, I oppose the clearcut harvest of 1,016 acres, the 2-aged shelterwood harvest of 1,869, and deferment harvest of 2,462 acres.

I do not oppose salvage harvests and thinning harvests ONLY IF they are carried out on terrain that is not steep enough to be prone to landslips. Having examined the topographical maps and visited some of the forest area, I believe most of the 4,449 acres selected for thinning is prohibitively steep.

I oppose the proposed 2-aged shelterwood harvest and deferment harvest on the grounds that both are very nearly clear-cut harvests (which I oppose for reasons listed below). A two-aged shelterwood harvest takes 90% of the timber, leaving merely 10-20 basal area, equivalent to only nine to nineteen trees of 14" diameter at breast height (DBH) per acre. A deferment harvest is only slightly less severe, taking 70-80% of the trees, leaving only 20-40 basal area or between 28 and 37 trees of 14"DBH per acre. These two kinds of harvest are almost as invasive as a clear-cut harvest and for this reason I oppose them for the same reasons I oppose clear-cutting.

I oppose clear-cut harvesting, and the two practices that are almost the same as clearcutting (described above), in this particular project for the following reasons:

1. The mountains are very steep, so the slightest disturbance can cause landslips. Anybody can easily observe this.
2. When the tree canopy is removed, the steep ground is exposed to rain, tending to cause erosion.
3. Building logging roads inevitably causes soil disturbance, which often causes slides sooner or later.
4. When rainwater flows down roadside drainage ditches and exits culverts on the downhill side, it erodes deep cuts or gullies.

I know the four problems above are real because I have seen them happening on previously logged land included the Project, as well as in other similar locations. I urgently urge you NOT TO LOG steep terrain.

5. THE MATURE FORESTS OF JELLICO MOUNTAIN HAVE A DISTINCT ECOLOGY AND A DISTINCT FLORA AND FAUNA THAT WILL BE DEVASTATED BY CLEARCUT LOGGING. These ecosystems have a value that is hard to define in money terms but is considerable nevertheless. The trees that support these ecosystems have value as standing, living things, quite apart from their value as timber. Logging the trees destroys these values. I ask the Forest Service to do more research into the ecology of mature forests, tapping into extensive research by biologists and conservation organizations, before destroying something that may never be recoverable.

6. CLEARCUTTING HAS MORE NEGATIVE EFFECTS THAN POSITIVE ONES. The Project authors mention some positive effects of clear-cutting, such as how opening up the canopy promotes new growth that enhances wildlife habitat. But they do not seriously consider the negatives. This imbalance needs to be corrected. For example, please consider how cutting all the mature oaks means no acorn mast for wildlife for twenty years, because that's how old an oak tree must be before it produces acorns. Another example: Felling mature forests means destroying habitats of bats and frogs. We may not always be aware of the roles played by these creatures, but as years go by, scientists discover more and more about their importance in maintaining biological balance and keeping harmful species in check. Yet another example: clearcutting opens up the canopy and thereby provides an opportunity for non-native invasive species such as autumn olive and tree of heaven and kudzu to get a foothold, as it were.. Any disturbance is an opportunity for these pest plants to establish themselves in the area. If there was far less clearcutting, there would be far less spread of invasives. On a recent visit to the Project area, I was horrified by the number of large tree of heaven trees with 6" DBH and larger. This is a serious problem that clearcutting will worsen.

7. MATURE FORESTS ARE VALUABLE "AS IS, " AS CARBON SINKS. Removing any trees over 80 years old means cutting short the lives of long-lived oaks that commonly live well over 200 years if left alone and as such constitute important carbon sinks. They are valuable left alive because they prevent more carbon being released into the atmosphere. Young trees that would replace felled trees grow fast and therefore remove carbon from the atmosphere at a fast RATE than old trees, but it will be 80-plus years before they store the sheer AMOUNT of carbon stored in a mature tree right now.

8. CLEARCUTTING FORESTS ADJACENT TO PEOPLE'S HOMES WILL DOWNGRADE THEIR LIVES. People live up and down the hollers below the forests marked for cutting. Not only will the beauty of their environs be destroyed, hydrological problems caused by logging such as landslides, erosion, and creek sedimentation will suddenly become THEIR problems. They will wake up one morning and find they are living in a wasteland. Or maybe they'll find their property is being engulfed by a landslide. It is cruel to do this to them. A WIDE BUFFER ZONE of untouched forest must be established adjacent to any piece of private property. This is the most essential and urgent alteration to the Project that the Forest Service must make, in my opinion.

9.. CLEARCUTTING WOULD ERODE THE TOURIST APPEAL OF THE REGION. A forest takes many years to recover from clear-cutting. For the first few years after a clearcut harvest, the area looks like a wasteland. Logging roads scar the slopes. Stumps and discarded tops (tree branches) make it look like a bomb was dropped. Tourism is not the top industry in Kentucky, but it is a source of income for the region around the Project area. And it is a source of enjoyment for those who engage in tourist activities such as hiking, photography, and nature enjoyment. Local people's incomes are important. Being able to enjoy tourist activities is important to everyone. Let's nurture these things, not erode them.

10. I ask that the contract process between the Forest Service and logging companies be more transparent. Is it true that a logger who contracts with the Forest Service may be allotted a valuable tract on the condition that he also agree to work on a less valuable tract where he must thin out undesirable species? Is there some other way to pay for the thinning of non-native invasive species such as autumn olive and tree of heaven. For while removal of these species is desirable, the people's forests should not be sacrificed in the process. This is too high a price to pay for the removal of autumn olive and tree of heaven. Clearcutting and opening up the canopy is a certain recipe for spreading these unwelcome plants. So the more the Forest Service rewards loggers with valuable timber tracts for removing pest trees, the faster these same pest trees will proliferate.

11. LASTLY, I OBJECT TO CLEARCUTTING BECAUSE IT DAMAGES AN ASSET THAT IS BETTER PRESERVED TO FUNCTION IN THE EMERGING MARKETPLACE OF CARBON-ASSETS. As we all face a changing world where climate change plays an ever more dominant role, it may be that the role of forests must change. I urge the Forest Service to consider a future where trees earn income in a carbon assets market, rather than in a timber market. Trees may soon be more valuable as living things than as dead lumber. They could earn an ANNUAL income as living things, rather than a once-in 80-years sale as a dead log. Moreover, forests as carbon sinks would be perfectly compatible with tourism, as tourism does not damage trees when done appropriately.

Thank you for hearing my comments. The Forest Service's work of protecting our forests has a long and distinguished history. Please keep in mind your motto, "Caring for the land and serving people," as you make decisions crucial to us all.

