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Comments: The Jellico project's massive, sprawling attempt to log the Jellico from wall-to-wall is wrong and likely to end in disaster for the area.

The first question any Forest Service planner should be asking herself about a new project is what impact the project might have on carbon emissions or carbon sequestration. The massive, landscape-scale soil disturbance and tree canopy removal that is envisioned in this project would result in an unjustifiable amount of carbon emissions, compared to the claimed benefits of the project.

The scale of forest disturbance contemplated in this project is an acute threat to the ESA-listed gray bats, Indiana bats, northern long-eared bats and Virginia big-eared bats in the area. Also, the tricolored bat, proposed for listing under the ESA, is found in the project area. Tree canopy removal in these species' habitat would not only remove forest canopy habitat for essential summer, spring, and fall habitat for these bats, it would also impact winter hibernacula for the bats, altering subsurface temperatures and humidity by removing shade and otherwise altering surface conditions. Also, listed bats would be directly killed during the felling of occupied trees, and aquatic bat food sources would be negatively impacted by altered hydrological flows resulting from road building, tree canopy removal, and associated disturbance.

The project also aims to carry out extensive tree canopy removal on steep slopes. The manifest danger of soil loss and slope failures in these areas makes clear that this is a fatally bad idea. One consequence of logging/tree-felling-induced soil loss and landslides, such as was suffered by the people of Ischia, Italy on November 26, 2022, is that local residents are put in danger of losing their property, life, and limb. So far, rescuers on Ischia have retrieved the bodies of 8 local residents from the landslide there, including a newborn baby and two sibling children. 5 people are still missing. The work of rescue searchers is ongoing. A local resident reported to the press that earlier this year, the trees had been denuded from the slopes at the site of the landslide, prior to heavy rainfall that occurred there last weekend.

While humans suffer from landslides and erosion, another consequence of tree canopy removal on steep slopes is extensive destruction and degradation of aquatic habitat. Eroded and failed slopes fall and wash down into the Daniel Boone National Forest's streams, threatening to kill and destroy/degrade aquatic habitat for ESA-listed species such as the Cumberland darter, blackside dace, Cumberland bean, Cumberland elktoe, Cumberlandian combshell, fluted kidneyshell, littlewing pearlymussel, and tan riffleshell. This activity also threatens to destroy and adversely modify critical habitat for the Cumberland darter and Cumberland elktoe.

The massive removal of tree canopy contemplated by this project also poses a threat to the imperiled insect and plant life present in the project area. All of the soil-disturbing activities contemplated in this project threaten to kill and destroy/degrade habitat for monarch butterflies (proposed for listing under the ESA). Cumberland rosemary, Virginia spiraea, and white fringeless orchid .

The project's aim to log 1,300 acres of un-designated secondary old growth is a more dramatic example of the above-mentioned problems with this project. For example:

1. Older trees feature more surface irregularities which make them more attractive as bat habitat.
2. It will cause more disturbance to fell and haul out those bigger, heavier trees.
3. Killing/removing bigger, heavier trees will result in more soil and slope stability loss than would the killing/removal of younger trees.
4. As a result of item #3, above, more water pollution will result from logging older forests.

5. The carbon pollution emitted from the killing of a mature tree (and from associated soil disturbance) is much greater than the carbon pollution from cutting a young tree.
6. Older forests are more likely to harbor rare, disturbance-sensitive plant species.

The U.S. Forest Service will require formal consultation with the U.S. Fish and Wildlife Service, and requires incidental take permits before proceeding with any soil-disturbing/tree felling activity in this project. The Center for Biological Diversity will consider litigation if these essential steps are not properly implemented according to the strictures of the Endangered Species Act.