

Data Submitted (UTC 11): 12/4/2022 4:48:50 PM

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Comments: I OPPOSE CLEAR-CUT LOGGING BECAUSE IT IS PROVEN TO BE A VERY POOR WAY TO REGENERATE OAK FORESTS

According to latest research, clearcutting is not an effective method for regenerating oaks when there are significant numbers of maple in the stand or in the vicinity.

Clearcutting (i.e. instead of selective cutting) designated forest areas would lead to destroying oaks in the understory in the long run because red maples, which grow faster, would create a canopy over and therefore dominate the relatively few young oaks below.

Further, the Jellico Project:

- fails to prioritize timely elimination of invasive species,
- fails to plant oak seedlings as needed, and
- fails to schedule / implement a follow-up regeneration program.

INSTEAD OF CLEAR-CUTTING IT IS PREFERABLE TO:

- start by removing all invasive species and planting replacement oak seedlings.
- harvest mature red maple trees and select harvest identified appropriate oak trees.
- kill / remove red maple from the understory.
- schedule / fund / implement a follow-up regeneration program to revisit the sites and cut / remove additional problematic understory.

PLEASE CONSIDER EXPERTS' RECENT FINDINGS ON OAK REGENERATION. I include some below.

Dr. Jeffrey W. Stringer, Chairman of the University of Kentucky's Department of Forestry and Natural Resources (reported by the American Forest Foundation 6 July 2021), stated, "We're overcutting our high-quality stands. There's still plenty of volume out there, but it can't go on forever, and we've known for a while that white oak is having trouble regenerating, so both of those things put together tell us there's a long-term sustainability problem coming... fast-growing species shade out oak regeneration, so selectively harvesting those competing species and letting sunlight hit the forest floor is a central component of regenerating white oak stands."

"Red maple is able to increase its numbers significantly when associate trees are damaged by disease, cutting, or fire. One study found that 6 years after clearcutting a 3.4 hectares (8.4 acres) Oak-Hickory forest containing no red maples, the plot contained more than 2,200 red maple seedlings per hectare (900 per acre) taller than 1.4 m (4.6 ft)." Source: United States Forest Service (USFS), United States Department of Agriculture (USDA). Vol. 2. Retrieved by Wikipedia 9 May 2007 - via Southern Research Station.

"The red maple can be considered weedy or even invasive in young, highly disturbed forests, especially frequently logged forests. In a mature or old-growth northern hardwood forest, red maple only has a sparse presence, while shade-tolerant trees such as sugar maples, beeches, and hemlocks thrive. By removing red maple from a young forest recovering from disturbance, the natural cycle of forest regeneration is altered, changing the diversity of the forest for centuries to come." Source: "Eastern Forests Change Color As Red Maples Proliferate". New York Times. Retrieved by Wikipedia 30 March 2015.

An article, Oak Regeneration, by Iowa State University Extension and Outreach, states that oak regeneration is obtained by either planting or performing cultural techniques to encourage natural regeneration. Planting is done 2-4 years before harvest or immediately after harvest. Planted seedlings must be protected from competition for 3-5 years or until they are 4-6 feet tall.