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Organization:

Title:

Comments: My name is Dr. Todd Yetter. I am a Professor of Biology at University of the Cumberlands (although I am not speaking as a representative of the university) and a concerned citizen of Whitley county. My training is in ecology and botany. My master's work was a forest ecological study of tree fall gaps in the Great Smoky Mountains National Park (Yetter, T.C. 1984. _Height growth rates of canopy tree species in natural windfall gaps, Great Smoky Mountains National Park_). I am familiar with true old-growth forests. Although now severely reduced in size, such forests have existed in a healthy state for literally thousands of years. It is therefore disturbing to hear Forest Service professionals speak of the "need" to cut these second-growth/recovering forests so that younger stands will be available. Please consider the following:

1. Older tree stands store vast amounts of carbon. The removal of these trees, through burning and decay, and the saws and heavy equipment used to remove them, will release vast amounts of carbon.
2. Existing forest holds soil in place, minimizing/eliminating...
 - a. soil erosion
 - b. stream fouling
 - c. flooding
 - d. landslides on steep mountain slopes
3. There are _many_ surrounding private lands in various stages of ecological succession, including the stages that the Forest Service wants to create by cutting. In contrast, you would be cutting some of Kentucky's most beautiful areas that are on their way to becoming mature climax forests. Further, treefalls, fire, lightning strikes, wind/storm damage, etc., are commonly occurring natural events that maintain the renewal of climax forests
4. Fragmentation of the forest due to cutting will reduce the large areas of forest needed by some species.
5. Soil compaction due to heavy equipment will increase runoff, minimizing the soil's ability to hold/retain water
6. Clearcutting...
 - a. exposes soil to maximum damage due to compaction, drying, runoff, and erosion
 - b. is unsightly
 - c. will negatively impact tourism
 - d. will negatively impact the NFS's reputation by the public:
 - i. Timber will primarily benefit loggers, negligibly/arguably benefitting local economies
 - ii. The majority of usable wood will be used for flooring, NOT construction
 - iii. Since contracts go to loggers, the perception will be that the NSF is benefiting by timber sales. Therefore, the NFS is selling timber to make money...
7. Cutting these areas of forest in the proposed manner will strongly, negatively, impact landowners of surrounding properties! Many people have purchased their lands assuming that the DBNF lands around them are safe from cutting and development. They are now angry and bewildered to think that much of the beauty around them may soon vanish; that their streams will become fouled; that the wild species they take part in protecting and enjoying may soon be diminished.

Several of my colleagues and I have been taking students to the proposed cutting sites for decades so that they can experience older growth/maturing forest ecosystems. We have found these areas _critical_/_essential_ in the courses we teach, including: Plant Biology; Plant Taxonomy; Dendrology; Ecology; Ecological Field Methods; Conservation. The very areas we find so important for observation and field studies are those being proposed as

cut sites.

Personally and professionally, I think it would be an enormous mistake to cut, and especially clear-cut, the proposed cut sites. The Forest Service's stated reasons for the cut, that is, the need for creating more areas of younger forest seems vacuous when considering the enormous amount of surrounding private lands in various stages of ecological succession. Further, the resulting damage to soil and streams, the carbon released to the atmosphere, the ecosystem fragmentation, and finally the loss of goodwill to the surrounding residents, FAR outweigh any perceived benefit. I would urge the Forest Service to reconsider its proposal to manage these 9,800 acres of forest by cutting them.