

Data Submitted (UTC 11): 12/5/2022 4:34:47 PM

First name: Deborah

Last name: Moses

Organization:

Title:

Comments: To Whom It May Concern:

Although I am not opposed to logging in a responsible manner, I am opposed to the current plan for logging the Jellico Mountain area of the Stearns District for many reasons. My property lies on Jackson Creek of Little Wolf Creek, as well as Thomas and Davenport Branches of Little Wolf Creek. The parcel located on Jackson Creek is bisected by the creek and is surrounded on three sides by the Daniel Boone National Forest. During the two meetings in which I've been involved with personnel from the USFS Stearns District, nothing has been said to assure me that my property won't sustain major damage and a decrease in value.

One of my major concerns is the increase in runoff and the sediment load increase associated with a major logging operation such as the one proposed for this area. The sedimentologist from the Stearns office stated that an analysis showing the increase in runoff had not been performed at this time. She stated that modeling for the current vegetative cover would be done, along with modeling for the post-logging cover. When asked about specific curve numbers for the modeling, no answer was given. Perhaps the most troubling response was to my question regarding the tolerance for the increases. She stated that the tolerance or threshold had not yet been determined. THAT IS TOTALLY LUDACRIS!! You cannot determine a tolerance after you know what the increase is. That is nothing more than the tail wagging the dog! My fear is that the increase in sediment will fill Jackson Creek and the increase in runoff will result in constant flooding of my property.

Another concern is that, when asked about the plan for revegetation plan for the proposed logging area, we were told that revegetation would occur "naturally". Some areas on my property were mined in the late 1970s and early 1980s. At that time, autumn olive trees were often used in the revegetation plans mining companies were required to implement. Since that time, autumn olive has been found to be an invasive species. However, they were used on my property and any logging contiguous to my property will be "naturally" revegetated with autumn olive trees. I see no benefit in having a national forest populated with acres and acres of autumn olive trees.

Continuing with my concerns, in the area in which my property is located, using the U.S. Fish and Wildlife Service IPaC (Information for Planning and Consultation) tool, there are no less than ten (10) endangered species and eight (8) migratory birds. If the proposed logging operation is allowed to move forward, at least three (3) endangered bat species' habitats will be wiped out. Moreover, when (not if) Jackson Creek is impacted, the Cumberland Darter and the Black-side Dace will be negatively impacted.

Moving to another area of the proposed project, the Jellico Creek area has several orphan benches along the River Gem seam of coal, which was extensively mined prior to the Surface Mine Act of 1977. The strata immediately above the River Gem coal seam is very acidic and was typically placed on the orphan benches, because operators were not required to eliminate highwalls at that time. Increased runoff from the logging operations will leach through the toxic strata located on the orphan benches at an increased rate causing the pH in the streams below the benches to drop significantly.

Finally, a project of this size and scope cannot be discussed without including the topic of climate change. It has been well documented that deforestation contributes to climate change in many ways. The amount of greenhouse gases that will no longer be captured by the trees removed by this proposed operation is quite significant.

In summary, the likely damages created by this proposed logging operation by far outweighs and economic gains. Please consider a more selective operation in order to maximize the continued benefits of the Daniel Boone

National Forest and minimize the damage to contiguous properties and the atmosphere, in general.