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Comments: I'm writing to add my voice to the multitude of comments you've been receiving demanding care and accountability in how you manage our public lands, specifically in regards to the proposed Jellico project.

My first introduction to this unique section of our national forest was many years ago when I first moved back to Kentucky after some time away. The friends I was with that day, who were deeply familiar with the land here, pointed out that it was an ideal area for the Forest Service to actually take an approach of managing for old growth, and leverage its expanse and location as a pivotal sanctuary and corridor for the many species (plant, animal, fungal, etc) who depend on older, more contiguous forest habitats. I remember being so excited at the time by the possibilities, and hoping that caring humans both inside and outside of the FS would eventually have the capacity to work together to actualize this vision-and so when the scoping documents came out this fall showing the extreme polar opposite, it was a special sort of gut punch.

Fortunately, this NEPA process may still serve as an opportunity for the FS to shift direction and act with the wellbeing of our forest communities as a priority (including the humans who inhabit them and appear to have some very strong opinions about this project).

The rationale that this area needs to be logged (including the extraordinary amount of clear-cutting proposed) in order to promote biodiversity is frankly ludicrous. The proportion of our forests globally, nationally, regionally, and locally that function as old growth is by far the most dramatically decreased of any age class, and the most at risk. So much of the forest proposed for cutting is on the verge of becoming functional secondary old growth during the timeline of this extended plan (and portions of the project area already qualify and are not being offered any 'designated old growth' protection). The graphs the FS likes to show describing forest age always astonish me in that you expect us to ignore the incredible surfeit of actual old forest and somehow believe that 150 years is about the pinnacle of age for our eastern trees, when the oldest documented black gum (a common tree in our region) is nearing 700 years-not to even dive into the role of standing and horizontal large diameter woody debris in old growth habitat! We urgently need to be managing for recovering old growth on our public lands. And even considering the importance of a mosaic of forest ages and habitat types, the refusal of the FS to look at the abundance of early successional habitat on adjacent privately owned land, or to consider non-anthropogenic phenomena such as ice storms, beaver meadows, etc in landscape diversification is a perennial issue, and no more acceptable in the case of Jellico than it has been for other projects where I've previously voiced these concerns. Furthermore, the skewing of focus toward the species who may prefer those more seral habitats while dismissing the needs of the many populations (and ecosystem functions) reliant on mature forest certainly reveals the role of the special interest groups such as the Ruffed Grouse Society who have the ear of (and too often, the contracts and closed-door meetings with) decision makers in the FS. We expect better of you. And you truly have an opportunity here to show us you can do better, with so many eyes on you at the moment.

When a local professional logger comes forward at a public meeting to recount his experience of having logged an area according to Best Management Practices, inspected and green-lighted by the state, only to have it lead to extensive landslides after the trees were cut, it tells us so much about the inappropriateness of logging on the unstable soils in this area. Maybe we can learn a thing or two from the travesties in Redbird and the lived experiences of the people in Jellico and not repeat these mistakes. I'm absolutely against not only clear cutting (which I use to include regeneration, shelterwood, and deferment harvests) in these mountains but also against the construction of skid roads for any form of selective commercial logging, especially on these steep slopes. I know logging is part of Multiple Use Management on our national forest lands, but that doesn't mean it has to be central to every single project proposed.

As someone who spends a lot of time reducing the population of and mitigating the damage from aggressive non-native vegetation on the land I steward, I have huge concerns around invasive species spread if you were to move forward with logging as proposed. In areas of Jellico logged in the last few decades, we've seen a tremendous increase in tree of heaven colonization (which from what I can tell hasn't been a management priority for the FS), and I suspect that even with all the herbicides and intentions the plan may offer, a significant portion of the landscape will become heavily impacted by both *Ailanthus* and *Elaeagnus*, another common invasive in the area (which, should we forget, the FS heavily promoted the planting of in our not-too-distant past—a good reminder that as the science and our understandings evolve, so can our practices). I would much rather see both the human and herbicide resources available to the FS go toward containing and decreasing existing populations of problematic invasives than toward creating and managing whole new populations, as the proposed logging will inevitably lead to. Despite what Mr. Taylor (who is clearly overextended by the expectation of covering the entire Boone as the sole FS botanist) may have said during one of our early virtual meetings on Jellico, this area is currently home to diverse and interesting plant communities well worth our time to thoroughly survey and hold safe from harm either directly from logging or through subsequent displacement.

Finally, how can it be in any way appropriate to plan a massive extractive logging project (let's just call it what it is) four decades into the future during this time of climate upheaval? The current science irrefutably demonstrates that leaving older forests standing plays a crucial role in carbon sequestration—and has been expressed as a priority of the current administration (which we may all have our complicated feelings around but as a federal institution, I would think would be somewhat relevant to your management decisions). And as we see extreme weather events increasing year to year in our state (including some very recent and vivid memories from our Jellico community!) taking risks with logging and skid road construction when there's simply no scientifically defensible reason to believe these actions won't impact the hydrology of the area, seems shockingly apathetic to the wellbeing of the ecological and human communities downslope and downstream. Some families have lived here for generations and fear losing their farms to landslide or flood. The endangered Cumberland arrow darter should certainly share those fears.

I think there's tremendous opportunity here for the FS to demonstrate that you're accountable to this NEPA process by acknowledging that the current proposal is so contrary to the wellbeing of the land and the expectations of the community that it should be scrapped in its entirety; and then move forward by working with the community and other invested parties such as Kentucky Heartwood to create an alternative plan that focuses instead on nurturing recovering old growth (including perhaps some careful site-specific fire management and non-commercial woodland restoration), increasing the resiliency of the watershed in the face of a changing climate and extreme weather/flooding events, engaging in responsible invasive species removal, and developing low-impact opportunities for recreation—which is urgently needed to meet the current human desire for wilderness (just look at how over-populated the Red River Gorge is on a nice weekend) and is certainly going to bring more long-term economic benefit to the area than 40 years of logging and the resultant scarred landscape, spread of colonizer species, sedimentation of waterways, loss of threatened and endangered species, and destabilization of the land itself.

Please, let this be one of those times when you can show that you truly are responsive to the voices of the community. It's happened before, and I would truly love to see it happen again and for us all to work together to actualize a vision of Jellico that grows more intact, healthy, and truly diverse with each passing season.

Also, I'd like to officially note that I stand behind the detailed comments that will be submitted by Kentucky Heartwood.

Sincerely,

Xyara Asplen