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Comments: Thank you for the opportunity to comment on the proposed 10,000 acre Jellico Mt. logging project. I have several concerns about the project as proposed. Specifically:

#### Landslide risks

The Jellico mountains are steep, and the soils are unstable. This has already caused landslides in the area, including landslides on private lands that have been logged. Community members live downhill of high-risk areas. Keeping the trees in the forest is the best way to hold soil in place and lessen the risk of landslides. In addition to destroying property and roads, landslides can dump erosion into streams. Streams in the Jellicos are home to endangered species such as the Cumberland Darter and Blackside Dace which are protected by federal law. The Forest Service's slope data demonstrates the seriousness of this issue. According to the table within the slope data document, the majority of the potential logging sites average 50% slope with some as high as 75%. These steep slopes intersect 2 or 3 coal beds. Coal beds under steep, logged slopes have high landslide risk as trees' roots decay.

#### Flooding risks

Mature forest helps soak up water. Catastrophic flooding occurred in the Jellicos as recently as July 30th, 2022. If the mountains are made bare with clearcuts, more water will find its way into the valleys where people live worsening flash flooding.

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#### Old growth

The proposed logging includes hundreds of acres of forest that could qualify as old-growth (over 120 years old). None of this older forest is protected in the area's "Designated Old Growth" area despite meeting tree size and age requirements according to the Forest Service's own guidance on old growth. According to work done in the area by expert dendrochronologist, Justin Maxwell, tree ages of one stand were found to be even older than the Forest Service estimated, with trees over 200 years old.

Logging mature and old growth forest stands not only creates problems for local community members, but also has negative consequences for the whole nation and even the world. This is because logging releases greenhouse gasses. The Forest Service needs to use the most recent science which shows that logging releases large amounts of greenhouse gasses when considering the environmental impact of this project.

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#### Invasive plants

Forests in the Jellico area that were logged in the 1990's have become heavily invaded with non-native Tree of Heaven, with some areas having as high as ¾ of the canopy. One of the best ways to control this invasive species is to not log the forest as invasives thrive on disturbance. Disturbance will also bring in other invasives such as autumn olive, which is already prevalent on private properties in the area.

#### Endangered species

According to U.S. Fish and Wildlife data, the Jellico Mountain area is home to at least 17 endangered species and 12 migratory bird species of concern. One of these endangered species, the Cumberland Darter (*Etheostoma susanae*) is only found in isolated populations in the upper Cumberland River system of Kentucky and Tennessee, and does not exist anywhere else in the world. In Kentucky, 13 streams in McCreary and Whitley counties, are considered "critical habitat" for this fish, and much of this habitat is in the Jellico project area.

I travel through the Jellico mountain area frequently and so logging such as that proposed would have a

significant impact on such a beautiful and rare area. Thank you again for the opportunity to comment and share concerns.