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First name: Ashley

Last name: Wilmes

Organization: Kentucky Resources Council

Title: Director

Comments: The Kentucky Resources Council is a nonprofit environmental law and advocacy organization that works to protect Kentucky's natural resources, fight for environmental health and justice, and teach citizens to be effective environmental stewards. The Council submits the following comments in opposition of this irresponsible and ill-conceived project.

Landslide and flooding risks: In addition to scarring the landscape and altering forest conditions for habitat and healthy streams, the clearcutting proposed by this project creates an unacceptable risk of soil erosion and landslides. The Jellico mountains are steep with unstable soils. Landslides are already an issue in this area, putting the community at risk. Keeping the trees in the forest is the best way to hold soil in place and lessen the risk of landslides and flooding.

Unwarranted destruction of mature and old growth forests: 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. Old growth and mature forests provide the foundation for rich soils and clean water, that are crucial components of healthy ecosystem.

On April 22, 2022, President Biden signed Executive Order 14072, to strengthen America's forests, boost wildfire resilience, and combat global deforestation. The President recognized the role that old-growth and mature forests on federal lands play "in combating climate change and the importance of maintaining their resilience." The Order also recognizes the importance of protecting public lands for recreation and preserving mature and old-growth forests. Despite and in contravention of this Executive Order, the Forest Service seeks to move forward with this project, which threatens the very types of forests the Executive Order was meant to safeguard, without full consideration of the impacts of doing so.

Failure to conserve federally protected 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. For example, streams in the Jellicos are home to the Cumberland Darter and Blackside Dace. This project will cause significant disturbance and will impact the survival and the recovery of listed species within the project area.

Finally, the Council also reiterates the comment submitted by the Center for Biological Diversity, that the "massive, landscape-scale soil disturbance and tree canopy removal that is envisioned in this project would result in an unjustifiable amount of carbon emissions, compared to the claimed benefits of the project." Indeed, mature and old-growth trees store more carbon than younger trees, so the Government cannot cut them down and replant them and expect to have a net-zero carbon impact, especially since the majority of a tree's carbon-sequestering capacity occurs in the second half of its life.

The Council urges the Forest Service to take a new approach to management and see the value of protecting the national forest on Jellico Mountain, rather than destroy it.