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Title:

Comments: Rather than consider the ramifications of the Jellico Mountain project from the forest perspective, I want to begin by respectfully asking the USFS to consider the tentacles of this proposed project. This timber, and the associated equipment required for this operation, will depend heavily on Whitley County Highway 1898 (Jellico Creek Road). Members of this community who travel Jellico Creek Road understand it's a narrow, unmarked, curvy and dangerous road that is often impassable due to periodic flooding, broken trees, and slides. These blockages can last several hours until the water recede, or road crews remove the debris. A two-inch rainfall over a short period of time can result in flood conditions. Unless personally you have met a fully loaded semi transporting logs in the middle of this road (which I have on many occasions) it may be difficult to understand the danger. Additionally, this road has a 29-ton weight restriction across the Jellico Creek Bridge. First concern: How will USFS provide for the safety of those traveling Jellico Creek Road, monitor the weights of trucks and provide for the maintenance of Jellico Creek Road?

Many of the residents of this community were like homing pigeons returning to the roost. We couldn't wait to leave but, soon after tried to figure out how to return. This valley was my home for eighteen years until I left for college and the military. I spent the next 45 years trying to get back home. My reasons for returning were partially nostalgia and partly financial. I considered property here a good investment. So, in 2008 I was able to purchase some acreage and return to this picturesque peaceful valley.

Second concern: How will this proposed operation effect the value of the surrounding property considering a cavalcade of equipment along with a cacophony of chain saws and heavy equipment over the next 40 years? The following concerns are specific to the affected forested area. I was first introduced to Japanese Knotweed about two years after my parents had a septic system installed. The entire area of the construction was covered with this pernicious invasive species. Kudzu, however, was familiar to me with the many growths along the highways. I had never seen any of this plant in the vicinity of Jellico Creek until a slide and bank stabilization project was completed a few years ago. The Kudzu started with just a few plants, but now covers several hundred feet in each direction along the road as well the area between the road and the creek. In a few years it will look like so many other areas along our highways where Kudzu has taken over. It's obvious these species cannot be controlled, and they can be easily spread using construction equipment as vectors. Third concern: Kudzu, Japanese Knotweed, Johnson's Grass, Autumn Olive, and numerous other invasive species hitchhike on equipment. How will the USFS guarantee that all equipment to be used in this proposed project gets decontaminated before transportation to this area over the proposed 40-year plan? Fourth concern: Has the USFS elicited the services of an independent agency, not associated with the USFS, to develop a comprehensive taxonomy of all plants and animals within this proposed project area? Additionally, is there an independent agency who will perform periodic sampling to insure none of these species are being threatened with this project?

I am very familiar with selective timber cutting. My Dad gave me an introduction 65 years ago. We were selectively cutting locust for fence post. The selected trees were felled with a crosscut saw with my dad often exclaiming, "Son quit riding that saw, you're killing me." The trees were then skidded to the bottom of the mountain with a mule, sawn into shorter lengths, split, and hauled out of the mountain. We drank from a mountain stream and destroyed no grapevines other than the one we used as a swing. No harm was done to other trees. I challenge anyone to find any evidence of our selective harvest. If it is necessary to harvest trees before they start to deteriorate, I have no issue with selective cutting. However, the use of mechanized equipment gouging roads around steep slopes just to get at a few trophy trees should never be allowed. I believe the USFS and the concerned citizens must come to an amiable agreement with regard to selective harvest and "Quit riding the saw" otherwise, how can we view the USFS as a protector of our forest.

Fifth concern: Has the USFS consider other less destructive methods of harvesting selected trees that reduces or eliminates the need for roads?

Clear cutting is not a difficult methodology to understand. I have experienced this with some of my property where it was permitted to go untended for a few years. The results have been universal in the establishment of new growth species. In a few years the field will be covered with sage grass, autumn olive, scrub pine, sweet gum, multiflora rose bush, and saw briers. When I envision a clear cut with this project after two or three years, I would expect similar results. If this area has any appreciable slope severe erosion would be a part of the landscape. I 100% oppose any clearcut operation where soil stabilization could be an issue.

Sixth concern: The USFS will clearcut unstable areas, cause severe erosion, and invite the growth of vegetation that does not benefit wildlife or the forest. What, if any, trees would be planted and cared for long term in the proposed clear-cut areas?

My final concern has been reserved for the proposed use of herbicides. I'm sure others more educated than I can expound on the long-term effects of herbicides. I'll only mention two recognized findings of the federal government. Exposure to the herbicide Agent Orange while in Vietnam contributed to numerous illnesses. Also, military members categorized as Blue Water Navy Veterans (Blue Water Navy Vietnam Veterans Act of 2019 PL 116-23) are those serving within 12 miles of the coast of Vietnam. Does this mean the harmful effects of herbicides could travel via inland water ways, through twelve miles of sea water, and contaminate a ships potable water? Evidently the scientific community believed it could and approved VA claims accordingly. Although Agent Orange and glyphosate have different chemical makeups, this shows how far reaching a chemical application can be. The topography in question for this project is primarily higher elevations. Everything below the treated elevation would be a possible target for any residual chemical. This does not include any windborne spread of chemicals.

Seventh concern: The application of herbicides will lead to unforeseen consequences regarding water, plants, animals, and soil contamination. Is herbicide application a mandatory step in this project or would USFS consider other plant growth control methods?

Thank you.