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Organization: Protect Our Woods
Title: Director
Comments: To whom it may concern:
The primary beneficiary of all the activities you are proposing, especially the timber sales, is not The Forest (as that term is commonly understood), but the Forest Service itself, or at least its budget. There is a concept called budget maximization that applies not just to the Forest Service or the USDA, but to all large bureaucracies, in which all other things being equal a bureaucracy will choose the option that is most likely to maintain or increase its budget. It also means that those within the agency whose values, training and professional expertise align with the interests of the agency in maintaining and expanding the budget tend to wind up in decision-making positions, and advance to higher levels of responsibility within the agency. And those priorities are also reflected in performance targets for individual national forests and performance reviews for line officers and other agency personnel.
Those whose choices and actions strengthen budgets get promoted and wind up in positions of responsibility because their choices feed the bureaucratic budget. There is a high correlation between those skill sets and policy priorities that happen to correspond with budget enhancement (especially logging, road-building, and more recently, fire) and those people who wind up advancing within the agency.
Sadly the Forest Service has come to conflate what is good for the Forest Service budget as being what is good for The Forest, especially with regard to the cutting and selling of trees.

The inability of the Forest Service to distinguish between what is good for the forest and what is good for the Forest Service is of particular concern because retention of receipts from the selling and removal of trees from the national forests has been part of the Forest Service's regular operations at the national level for years and sadly their budget now apparently depends on the continuation of that practice, since they have not yet found a replacement for the income generated from selling the biggest and healthiest trees. And the Forest Service has assiduously hidden this self-dealing from the public
When trees were cut for "timber" back in the 1980s there was an expectation that the sales would be profitable and that most if not all of the money received from selling the trees from the national forests would be returned to the treasury. With the discovery that the Forest Service was losing hundreds of millions of dollars on timber sales from the national forests (in part because so much of the revenue was winding up in Forest Service coffers), and with growing public outrage at the degradation of the public forests resulting from the logging, the timber sale program was scaled back; but the cutting and selling of trees continued under different guises and the rationales for the retention of receipts became more creative.
The Forest Service has continued to sell trees as "salvage," "sanitation," "stewardship," and most recently, "restoration." The beauty of the use of the term "restoration," from the Forest Service perspective is that most people support the idea of restoration, most people don't realize it is a euphemism for logging, and best of all, the Forest Service gets to keep all the money because there is no expectation that work conducted for forest restoration should make money.
It would be easier to understand what is at stake in the Jellico Mountain logging project if the Forest Service would be more forthcoming about the financial incentives involved and what is to become of all the trees that are slated for removal and the revenues generated by selling them.
Please answer the following questions regarding funding and budgeting and performance reviews and targets

With respect to annual Congressional appropriations, please provide information regarding the budget for the Daniel Boone National Forest for the five most recent years for which you have data, specifically dollar amounts received and any targets or directives related to timber cutting, whether silvicultural or forestry goals and objectives, ecosystem management, natural resource management, restoration, or any other category that involves selling, cutting and/or removing trees, the sale of which generates revenues
Targets or directives included in Congressional appropriations

Targets or directives from the Washington Office of the NFS
Targets or directives from the Regional Office for the Southern Region
Targets established by the Forest Plan for the DBNF
Monitoring reports related to any of the above regarding level of success in meeting targets set for the DBNF submitted to the District Ranger
Monitoring reports related to any of the above regarding level of success in meeting targets set for the DBNF submitted to the DBNF Supervisor
Reports submitted by the DBNF Supervisor (or others) to the Regional or Washington Forest Service Offices regarding success (or failure) in meeting any targets established for the above
Information regarding performance reviews for District Rangers and/or the DBNF Supervisor with respect to targets or other performance goals related to the sale and removal of timber and the generation of revenue. And finally,
Is success in fulfilling such targets a component of performance reviews for District Rangers and/or the Forest Supervisor for the DBNF?
With respect to revenues from operations that the Forest Service is permitted to keep, for the same five years, please indicate into which, if any, of the following six funds your agency deposited funds generated by silvicultural treatments or any related activities (ecosystem management, natural resource management, restoration, or any other category that involves selling, cutting and/or removing trees, the sale of which generates revenues) on the Daniel Boone National Forest, the dollar amounts deposited, the sources of those revenues, and the percentages of those revenues deposited:
Brush Disposal
Credits for Purchaser-Built Roads
Knutson-Vandenberg (K-V) Fund
Salvage Sale Fund
Stewardship Contracting Fund
Timber Sales Pipeline Restoration Fund
And recent reports suggest that fire has made up approximately half the entire Forest Service budget in recent years. Please include in your budget response the role of fire and how those funds are budgeted and allocated. Is it on acres proposed, acres completed, or some other basis?
People have lost all faith in the ability of the Forest Service to live up to its stated mission of caring for the land and serving people. What you care for and what you serve are one and the same and that is the well-being of what the Forest Service refers to as "The Forest," which is of course, in reality, the Forest Service itself and there is no better indicator of the well-being of the Forest Service than the well being of its budget. Except that it has sold its soul and betrayed its ethos

In addition to concerns about financial incentives that drive projects like this I would like to offer the following additional comments:

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 (source)

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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 it thrives 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.