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Organization:

Title:

Comments: THANK YOU FOR LISTENING AND INCORPORATING OUR FEEDBACK

I want to start by saying thank you for listening to my feedback and to the feedback from our community in November 2022 during the Scoping phase. Alternative 1 shows you listened well to the people who live and work alongside the national forest in the Jellico Mountains. You incorporated some of our major points into Alternative 1. In particular, the things I noticed in the DRAFT Environmental Assessment you just published where you took our feedback into consideration includes the following.

1. Alternative 1: You removed the two most severe forms of clearcutting entirely, outright clearcut and deferment harvest. My feedback and the feedback from our community consistently requested you do not clearcut our steep mountains.

2. Alternative 1: You are proposing that the project last 4 to 6 years. This is a vast improvement over the 40-year timeframe proposed in the Proposed Action. My feedback and the feedback from our community consistently indicated 40 years was far too long a timeframe. I am hopeful that by the end of the 6 years, you will have an updated Forest Plan, given it was created in 2004 and is now 20 years old and at least 5 years behind schedule for an update.

3. Alternative 1: You reduced the total logging from 10,000 acres to 3,000 acres.

4. Alternative 1: You saved the 8 trees were aged to be between 252 and 147 years old, located above Emby Moses road. These trees are in Compartment 6267 Stand 2 and Stand 4. I specifically asked you to do this and whether or not you did it because I asked, I am grateful.

5. Alternative 1 and Propose Action: You removed 177 acres of old growth in 4 stands: Compartment 6250 Stand 4, Compartment 6253 Stand 21, Compartment 6260 Stand 10, Compartment 6269 Stand 19.

## SELECT ALTERNATIVE 2

I would like you to select Alternative 2: No Action. Yet if you were to choose this option, I would ask you to not exactly take NO action and instead, DO work on getting rid of the invasive species that are spreading as a result of what I understand was the logging that happened in the 1990s. There are many stands of Tree of Heaven and Autumn Olive that have never been addressed to my knowledge and have taken over big areas of the forest and are choking out native trees and plants. Tree of Heaven is especially a problem because it is the preferred food source for another invasive species, the spotted lantern fly. And because I am a beekeeper, spotted lantern flies are a huge problem. Honeybees collect spotted lantern fly excrement because it is sugary. We call it "honeydew" but it's bug poop and it ends up in honey. While it is edible and the bee gut sanitizes it, I understand it tastes terrible. I don't want that in my honey, so you really need to get up to the forest for which you are the steward and get rid of as much of the Tree of Heaven as possible. We are working on removing Tree of Heaven from our own land. Please remove it from the national forest, owned by the people of the United States. Note that this concern

regarding invasive species and in particular Tree of Heaven applies to both Alternative 1 and the Proposed Action.

Second, I would like you to consider additional recreation in the Jellico Mountains. I saw that you replied repeatedly to our comments saying that all our recreation ideas are outside the scope of this project. Not one of our ideas was worth considering? You can't propose something even in a separate project that increases recreation in the Jellico Mountains? No hiking trails? No mountain biking trails? No additional campsites? This made me sad. I understand that THIS project is about logging, but your answers to our suggestions were a flat out "no, sorry, it's out of the scope." I was disappointed that you didn't even suggest where we could go to make these proposals. Is there a website where citizens can make suggestions for ways we all could better enjoy our national forests? Please could you go back and see if anything we suggested is something you could work on? Note that this applies to Alternative 1 and the Proposed Action as well.

#### IF NOT ALTERNATIVE 2, PLEASE SELECT ALTERNATIVE 1

If you are unable to select Alternative 2, then I implore you to please select Alternative 1. This is the compromise solution. Alternative 1 allows you to move forward with the first phase of your logging plan while incorporating several of our communities' biggest concerns, which I summarized in the "Thank You for Listening" section. To make Alternative 1 even better, I ask you to consider incorporating the following ideas.

1. Move the two-aged shelterwood from 10-20 basal area (BA) to something higher, like 20-30 BA. In other words, leave more than 10-15% of the trees standing. These slopes are some of the steepest in all of Kentucky. A 10-20 BA is only 9 to 19 trees of 14" or more in diameter at breast height (DBH) per acre. That is hardly any trees per acre and is not enough to hold the soil in place and not risk landslides, flooding, soil erosion, and clogged streams.

2. Do not spray herbicides except for stump-only application. I am a beekeeper with 99% survival for all my time as a beekeeper. I have only had 1 colony die EVER. See my recently published book for details, "Dead Bees Don't Make Honey: 10 Tips for Healthy Productive Bees." Your plan to spray herbicides simply will not help my bees or all the other pollinator species who make the Jellico Mountains their home. Honeybees and pollinators suffer from many stressors and pesticide exposure. EVEN AT SUBLETHAL DOSES, herbicides reduce their health and increase their risk of colony death. In the US in 2022/2023, 48% of all managed colonies died. I have 99% colony survival for all my time as a beekeeper and you spraying herbicides up on the mountain will definitely NOT improve the health of my bees, I can guarantee that much. In addition, please remember that bees fly up to 2 miles in any direction to forage for nectar and pollen. My bees will absolutely be exposed to your spraying, as your logging and herbicide application is well within range of their foraging distance. It is unclear how much you plan on spraying as you only say you will spray within the legal limits. But if my bees start dying when you start your work and I have changed none of my management practices, that will be a problem. Instead, please don't spray herbicides except on STUMPS.

3. Designate those 177 acres as old growth with a "prescription change." These are the trees in the following 4 stands: Compartment 6250 Stand 4, Compartment 6253 Stand 21, Compartment 6260 Stand 10, Compartment 6269 Stand 19. I know when a small group of us met with you on May 7, you said you had no plans to make any prescription changes. I am asking you to change your mind and set those 177 acres aside as permanent old growth. That way, if you choose Alternative 1, once the 4 to 6 years is over and assuming you propose more logging after the 4 to 6 years is up, you would have already taken those 177 acres off the table for logging so they can be preserved in perpetuity for future generations. Or if you move on to a new job, the man or woman who comes in behind you will hopefully not log them either because of their official old growth designation.

4. Designate the 2 stands with the 252 to 147 year old trees as old growth that are located above Emby Moses road. These trees are in Compartment 6267 Stand 2 and Stand 4. Please make a "prescription change" so they are preserved as old growth as well.

#### DO NOT SELECT THE PROPOSED ACTION

I implore you to not select the Proposed Action. Nothing has changed since I wrote my comments back in November 2022. Yet that plan is not appropriate for this community and for the environment. I won't repeat everything I already submitted back in the Scoping phase, but instead, will summarize the two main points I made already. The first is that logging 10,000 acres total and nearly 5,000 acres of that using 3 forms of clearcut is a terrible idea on our steep mountain slopes. The second point is that 40 years is simply too long a timeframe. None of us have any real idea what the world will look like in 40 years. I am long dead by the time 40 years is up and you, my friends at the Forest Service proposing this project, are long gone onto different jobs yourselves and probably retired by then. Forty years is simply not a reasonable timeframe. This world is warming and no matter why it's happening, this forest will be different and probably will need different actions in 20 year, let alone 40.

#### PROBLEMS WITH ENVIRONMENTAL ANALYSIS DOCUMENTS

I want to point out that two of the Specialist reports published in the EA Supporting Documents are not representing the best available approach.

1. Socioeconomic Report: The economic report included in the EA is not adequate and is one-sided. This report quantified the monetary benefits of logging and compared the NPV (net present value) in terms of dollars related to logging for each of the alternatives. But this report but did not even attempt to monetize the costs of logging or the benefits of a standing, intact forest.

For example, this community experienced massive flooding on July 31, 2002 in Jackson Creek and Little Wolf

Creek. The damage was so extensive that many residents could not return home because the roads were impassable. In one area near Davenport Hollow, the road was gone. The county had to repair the road and were out at midnight fixing it.(1) Another example is that the water from Little Wolf Creek and Wolf Creek flow into Clear Fork which flows into the Williamsburg water supply.(2) Sediment from runoff due to logging will increase costs to clean the water for residential use. Why are these types of costs not included in your economic analysis? Your soil report indicates that flooding and erosion, with the potential for landslides, will increase in the Proposed Action and Alternative 1, so why are these costs not included in these decisions to log, how much to log, and where? Performing estimates of these costs is just as easy and appropriate as it is to perform estimates of the income from logging.

In addition, why are the environmental services that an intact, undisturbed forest not quantified in the benefits section of the economic report? We know that a standing forest cleans water and air. Why are these benefits not quantified and included in the Alternatives that propose less logging?

2. Climate Change Report: This report still talks about "rate" of carbon sequestration when the total is what matters. While it is true that a young forest sequesters carbon at a faster RATE than a mature forest, a mature forest sequesters more TOTAL carbon by far than a young forest. Plus, it takes 80 years for a young forest to that was chopped down to regrow to equal the amount of carbon that same intact 80 year forest would have been sequestering the whole time it took the young forest to grow. Why does the climate report continue to talk about the rate when what matters is the total? Cutting down a forest so new trees can grow back as a justification for climate change does not make sense.(3) In addition, you say it yourself that the Jellico Mountains are trending towards a mature forest. Why not let our mature forest continue to age so it can become old growth? How will we ever increase the percent of old growth forests if we keep chopping it down when it's mature?

If you are unable to pick Alternative 2, pick Alternative 1 and I hope you will consider my suggestions and suggestions from the community to improve it. Please, for all the citizens of the United States and for future generations, do not pick the Proposed Action.

Respectfully,

Theresa Martin

Concerned Citizen and Resident of Williamsburg, Kentucky

REFERENCES

(1) Flooding so bad near Jellico Mountains that residents qualified for FEMA assistance.

<https://www.thenewsjournal.net/whitley-county-residents-now-eligible-for-fema-assistance-for-july-31-flooding/>

(2) Forest To Faucets US Forest Service website shows Wolf Creek is an 81 out of 100 for importance to the water supply of Williamsburg, KY.

<https://storymaps.arcgis.com/collections/4e450a6c7ed24f0cbae4abc1c07843b7?item=2>

(3) What matters for climate change is not the rate of carbon sequestration of a forest but the total. See Figure 4 and Figure 6. [https://extension.oregonstate.edu/sites/default/files/documents/sloanj/pnw775\\_3.pdf](https://extension.oregonstate.edu/sites/default/files/documents/sloanj/pnw775_3.pdf)