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Organization:

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Comments: SUMMARY OF COMMENTS:

Of the three plans presented (the Proposed Action and two alternatives), I support Alternative 1, as it is the best all-round compromise most likely to be acceptable to the largest number of people.

I strongly oppose the Proposed Action for reasons set out below.

I strongly believe Alternative 2 is the best course of action, BUT I am aware that it is unpopular with special interest groups such as grouse hunters who prefer the Proposed Action. For this reason, I am All 1 as a compromise that everyone can live with.

DETAILS:

I OPPOSE USFS's PROPOSED ACTION because it is very similar to the original 2022 logging plan which I opposed for reasons given in my 2022 comments posted on this website.

As the acreages of the various treatment types are only marginally reduced in the Proposed Action, all the bad outcomes of clearcutting, 2-aged shelterwood treatments, and deferment harvests that I listed in my official comments posted 11/22/2022 would still take place.

Most crucially, the terrain of targeted areas is VERY STEEP. Any disturbances caused by logging machinery on those steep slopes will cause EROSION and LANDSLIDES. Access roads and the vehicles that construct them will do the same. Clearcutting, 2-aged shelterwood treatments, and deferment harvests will remove the tree canopy, allowing rain to pummel the soil directly, causing erosion and eventually landslides. This terrain is too fragile to be logged.

Erosion runoff will cause the MUDDYING and the SILTING OF CREEKS, endangering aquatic species such as the endangered Cumberland darter (*Etheostoma susanae*) and the Blackside dace (*Chrosomus cumberlandensis*), and spoiling water resources used by livestock, wildlife, and people.

Removal of vegetation that would otherwise absorb rain will cause more frequent FLOODING, washing out local roads, flooding local residents' land, and damaging their homes.

Logging trucks WILL DAMAGE ROADS AND HIGHWAYS, inconveniencing everyone, and leaving counties and the state to bear the cost of repairs. Highway 92 West, only recently upgraded, will be damaged. Unsurfaced roads leading to the forests will be hardest hit, negatively impacting travel and commuting for local residents in particular.

Clearcutting and near-clearcutting will reduce THE DIVERSITY OF THE ECOLOGICAL COMMUNITY that now thrives beneath the forest canopy, endangering the lives of diverse plants and animals, some of them rare and even endangered, that are now nurtured by the forest.

Cutting down forest stands will destroy the value of the forests to HUMANS, too. People, myself included, walk and hike in these woods, and enjoy their beauty, the plants and animals they nurture, and their peacefulness.

These forests give me PRIDE AND JOY. When friends visit from the city or overseas, I show them these forests and see wonder and envy on their faces.

The Proposed Action will have a negative impact on REAL ESTATE VALUES. The region's residents include a growing number of people from other states who choose to re-locate here because of the natural beauty of the area. We don't have much in our region except natural beauty - so don't destroy it.

The Jellico Mountains when covered with mature and aging forests have value as a REPOSITORY OF CARBON contributing to the reduction of atmospheric carbon and slowing global warming. Logging as planned in the Proposed Action will much diminish this value for the next 80 to 100 years.

Logging WILL NOT BRING LONG TERM EMPLOYMENT to our region. By contrast, developing the recreational potential of the forests would provide for long term uses of the forest that would bring long term employment opportunities.

Logging will provide VERY LITTLE SHORT TERM EMPLOYMENT in the local community. Most local loggers are smaller operators and they admit that they cannot afford to buy the kind of liability insurance that the USFS requires. Bids will be won by larger loggers from distant areas who will spend very little money locally.

Silviculture BEST MANAGEMENT PRACTICES WILL NOT EFFECTIVELY PROTECT the Jellico Mountains from

damage. Even if the FS strictly enforces Best Management Practices, extensive damage will be done by loggers for which they cannot be held legally accountable. This is because the BMPs DO NOT QUANTIFY acceptable limits to , for example, soil disturbance. BMPs require certain measures be taken to reduce soil disturbance and reduce erosion, sedimentation, and so forth, but there is no statement as to how MUCH erosion or sedimentation, etc., is allowable, and NO MEASUREMENT METHOD IS DEFINED. There is no BMP outlawing logging on slopes steeper than a specific percentage of grade, even though it is easy to measure grade. With slopes as steep as in the Jellicos, the ten silviculture BMPs will be powerless to prevent serious deterioration of the landscape, even though they might be somewhat effective on milder slopes.

The Proposed Action plan DOES NOT DETAIL HOW, WITH WHAT PRODUCT, AND WITH WHAT FREQUENCY HERBICIDE TREATMENTS WILL BE APPLIED, so there is no way to judge if herbicide use will be safe and/or effective.

INVASIVE PLANT SPECIES (autumn olive, tree of heaven, kudzu) will be stimulated to grow by the removal of the canopy through logging. These invasives grow faster than desirable native species and will crowd them out and eventually replace them if left unchecked.

The Proposed Action includes ERADICATION OF INVASIVE PLANT SPECIES, but METHODS AS BROADLY STATED ARE INADEQUATE. In some of the mature stands marked for clearcutting, I noticed a large amount of the invasive species "tree of heaven." To cut these down and spray regrowth once with herbicide will have no effect on their ability to regrow as they have extensive root systems. I know from painful experience on my own land that each stump will grow about 20 sprouts that will be unpalatable to deer and other animals until they mature into trees too high for browsing deer to reach. Therefore eradication methods must include MULTIPLE repetitions of chopping and spraying, and maybe some praying and cussing too. Without plans and funds for an extensive schedule of treatments, the regrowth of desirable native species will be outpaced by regrowth of tree of heaven and other invasive undesirables like autumn olive and even kudzu.

The Proposed Action LACKS A PLAN FOR REPLANTING OR RESEEDING DESIRABLE SPECIES. In earlier times, forests readily re-propagated by themselves after logging, but in recent decades white oaks, in particular, have been slow to reestablish, facing competition from maples and invasives. (see <https://forestrywebinars.net/> for a May 9, 2023 webinar Restoring Upland Oak Forests). The USFS's particular interest in white oaks will be frustrated by their failure to proactively propagate white oaks after logging.

IN SUMMARY, THE PROPOSED ACTION WOULD BE A DISASTER.

ALTERNATIVE 1 IS PREFERABLE TO THE PROPOSED ACTION because it removes clearcutting and deferred harvest from the plan, significantly shortens the term of the project, and reduces acres affected by a meaningful amount.

The NEGATIVE EFFECTS of the Proposed Action would also APPLY TO ALTERNATIVE 1, BUT TO A MUCH LESSER EXTENT in most cases.

The forest and the community it supports WOULD RECOVER FASTER from the onslaught of Alternative 1 than from that of the Proposed Action.

HOWEVER, SOME RARE AND ENDANGERED SPECIES MAY NEVER RECOVER but instead may become extinct.

Alt 1 would be a compromise in which all parties could find something they like.

On the one hand, Alt 1 includes 1,122 acres of 2-aged shelterwood logging that removes 90% of trees and will stimulate the creation of early successional habitat that many hunters claim is needed to support grouse and other wildlife populations.

On the other hand, by omitting 931 acres of clearcutting and 2,434 acres of Deferment Harvest, and reducing 2-story Shelterwood Harvest by 783 acres, Alt 1 significantly reduces the damage to the soil and terrain and ecology.

There is something for everyone in this plan.

It is a good compromise until the various scientific views concerning whether clearcutting hurts or helps biodiversity get debated and verified or not by empirical studies. (See National Geographic article, March 2022, "Is clear-cutting U.S. forests good for wildlife?")

My FIRST PERSONAL PREFERENCE IS ALTERNATIVE 2 - NO ACTION.

REASONS:

1. None of the negative outcomes of the Proposed Action and Alternative 1 would take place.
2. There would be positive outcomes, as follows.

Alternative 2 would SERVE THE INTERESTS OF THE GENERAL PUBLIC. The owners of the forests are all the citizens of the USA, far greater in number than special interest groups that stand to gain from logging. Alt 2 would serve the general public, availing them of a beautiful environment, recreational opportunities, access to a natural ecological area with high species diversity, and reduced global warming as more and more forests across the nation are preserved and function as an effective, low cost carbon sink.

Contrastively, the Proposed Action plan, and to a lesser extent Alt 1, would serve only special interest groups, such as grouse hunters, (non-local) logging companies, lumber merchants, and manufacturers of white oak barrels for the bourbon industry.

By preserving white oaks, Alt 2 would have the POSITIVE EFFECT OF STIMULATING THE BOURBON INDUSTRY to pursue alternative ways to use white oak to flavor whiskey, and also not depend on publicly-owned forests, but instead establish their own. Aging bourbon in oaken barrels is expensive today, but will become plain impossible in the not distant future as white oak resources get used up. No matter how much money bourbon producers spend on lobbying, and even if they manage to procure white oak from some public forests, it will not be long before supply will dry up. Some producers are already experimenting with using oak chips rather than barrels. Some companies have bought forest land and established plantations of white oak that will be ready to log in 80 years. This is preferable to the Forest Service being pressured to sell publicly owned forests - and using our tax money to do so.

Alt 2 PRESERVES MATURE, LIVING TREES THAT ARE VALUABLE AS LOW COST CARBON STORAGE DEVICES. As global warming increases, this value of trees will grow to eclipse all others.

Simultaneously, THE FORESTS THAT ALT 2 PRESERVES ARE BIODIVERSITY STRONGHOLDS.

Unlogged forests are also a RECREATIONAL RESOURCE. There is potential for developing hiking and biking trails, lodging, etc.