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Organization:

Title:

Comments: Dear Stearns Ranger District,

I want to express my appreciation for the Forest Service personnel who have listened and responded to the concerns of community members regarding the Jellico Vegetation Management Project. All of you have a tough job and I thank you for your willingness to consider input from members of the community.

In terms of the current vegetation management project proposals:

I would ideally like to see the area protected from extensive logging (Alternative 2) but understand that National Forests are designated as multi-use, which includes some harvest. I don't oppose logging as a management tool and recognize that newer growth/early successional forest habitat is beneficial for some species. This must be weighed against measures to protect the natural beauty of the area and maintain the integrity of mature forests. The outdoor experience offered by the region included in the proposed project area should be a deep source of pride for residents of Whitley and McCreary County - we should be encouraging more recreational use of it - hiking, camping, birding, and enjoying native plants.

I strongly object to both the Original and Slightly Modified Proposed Action options. Thousands of acres clear-cut/effective clear-cut would destroy what many of us consider a beautiful natural area, making it unsightly and unnatural. I have never heard anyone describe a clear-cut area as beautiful, inspiring, restful, or offering the joy of experiencing the outdoors.

1. Though the Forest Service works to assess impacts that include erosion, landslides, fouling of streams, the constant traffic of logging trucks and heavy equipment, the noise from vehicles and equipment, and the loss of wonderful habitat, I do not have confidence those can be sufficiently quantified.

2. The suggestion that extensive clear-cutting and/or thinning will increase biodiversity applies to some very specific contexts, but the nature and quality of that diversity matters. Early successional landscapes do provide suitable habitat for some desirable game species, but other valuable species, including birds and native plants, thrive in mature forests and have important biological relationships with pollinators, fungi, and other organisms. Though biodiversity is often thought of as referring to the organisms we can easily see and hear, this ignores the vast below-ground network present in mature forests, where extensive root systems create the habitat for countless soil fungi, invertebrates, microbes, etc. These would certainly be impacted by extensive clear cutting. Game species are valuable but so are the many other species that occupy mature forests. They are beautiful and help create healthy, resilient, more self-sustaining habitats.

3. For the most part, there is no guarantee that the individuals/companies doing the logging, adding roads, making noise, and doing damage would consist of area residents who have a vested interest in protecting the region. Non-residents would be causing profound changes they would not have to live with. The families living in adjacent areas would carry the burden of all the impacts, including making the extensively cut areas an eyesore.

4. The area offers wonderful educational opportunities - I regularly take students to some of the proposed project areas, such as along Ryan's Creek, to teach them plant identification, bird identification, about forests as natural areas, and show them examples of older, mature trees. These all help connect students to the beauty around them and highlight the importance of conservation efforts, which can be paired with the multiple use approach intended for National Forests.

5. The terms "habitat restoration" and/or "enhancement" used in the context of this proposal seem to mean recreating the previously disturbed conditions from which the forests have partially recovered. Many conservation biologists understand restoration as creating the conditions needed for a forest to naturally mature and grow in complexity, both biologically and structurally. Management in the form of clearcutting, especially over large areas, does create a particular type of habitat, but not a natural one. Natural disturbances, like the gaps created by tree falls, are very modest in size by comparison. Maturing forests are valuable on their own and are not, by definition, unhealthy.

6. Beyond the longer-term consequences of clearcutting and habitat modification there will certainly be immediate losses of small mammals, plants, invertebrates, and other organisms due to the felling of trees and the movement of vehicles and heavy machinery through the forest.

7. As a resident of Whitley County I would hope the beautiful surrounding forests are not seen as a go-to source of harvestable trees by clearcutting, so other, more widely used and familiar recreational areas in national forests can be spared the damage.

I would prefer to see Alternative 1 adopted for the following reasons:

1. While some species may benefit from extensively manicured (or disturbed) habitats, larger forest tracts of mixed age trees that have a closed canopy are beautiful and support tremendous diversity of their own. Many animals, plants, fungi, invertebrates, microbes, etc. thrive in forests that have older trees and are structurally complex. Having these interspersed with new growth forests would provide a mix of habitats and benefits for overall greater diversity. It would also be much more aesthetically appealing.

2. A mosaic of older, more mature forests and new growth provided by careful selective cutting would help meet the objectives of several groups who have an interest in how this project goes forward. Those wanting early successional habitat for game species would have some gains, those who love and appreciate the value of maturing forests would have more of such areas maintained, and residents who live on adjacent tracts of land would be assured that the aesthetic value and quality of their properties was valued and respected. Their concerns are important and valid.

3. Fragmented habitats do look more natural, but the size of patches left intact can have a significant impact on some species. I would hope the Forest Service would implement logging in a way that offers the largest possible patches for the sake of forest species that depend on them. Large patches would still create the kind of edge habitat suitable for some game species, as would adjacent areas that are logged.

So, Alternative 1, it seems to me, would help the Forest Service meet some of its goals for harvest and economic benefit, create some of the cut/disturbed areas and habitat sought by organizations focused on hunting and game species, and acknowledge the aesthetic, ecological, and recreational value of maturing forests.

Thanks again for the opportunity to comments.