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Comments: I am writing to submit comments with respect to the Jellico Vegetation Management Project #63037. Quite simply, the Proposed Action is irresponsible. I support a NO ACTION alternative with modification to manage invasive Autumn Olive and Tree of Heaven.

On its face, a 40-year logging proposal is absurd. It is grossly irresponsible to make legally binding, site-specific decisions four decades in advance, especially considering that the entire Daniel Boone National Forest Management Plan is supposed to be revised every 10 to 15 years. Imagine if we were currently logging in 2024 based on a logging project that was approved in 1987, based on a Forest Management Plan that was implemented in 1967? Surely we can find ways to manage our public forests more responsibly.

That aside, the Proposed Action is highly problematic in its details. As part of the NEPA process, I must express my opposition to the Forest Service's indiscriminate cutting of older forests driven by volume-based timber targets. Older forests are vital for biodiversity, carbon sequestration, and habitat preservation. It is also concerning that the Forest Service is placing the timber volume mandate above other critical forest needs like recreation, forest health, and water quality. By prioritizing timber targets, the agency risks undermining the overall well-being of our forests and the communities that rely on them. Linking timber targets to performance reviews of Forest Service staff further exacerbates extraction from public land, potentially incentivizing actions that prioritize short-term gains over long-term sustainability. It's crucial for decision-makers to recognize the multifaceted importance of our forests and ensure that management practices align with broader conservation goals outlined in President Biden's Executive Order aimed at preserving mature and old-growth forests.

Furthermore, the Forest Service's analysis of landslide risks in the Jellico Mountains does not address the most relevant issues related to this significant hazard. Given the steep and landslide-prone nature of these mountains, it's crucial for comprehensive assessments to be conducted. I urge the Forest Service to take a deeper look at the landslide risks and the serious issues raised by Kentucky Heartwood. By prioritizing thorough analysis and incorporating additional expert guidance, we can better safeguard against landslide risks and ensure the safety and stability of the Jellico mountains and surrounding areas.

Regeneration cuts, such as clearcuts and shelterwood logging, in mature and old-growth forests has no place in the Jellico Mountains. These practices pose a significant threat to the crucial role mature and old growth forests play in mitigating climate change, as emphasized in President Biden's Executive Order. The best available climate science unequivocally demonstrates the importance of mature and old-growth forests for climate change mitigation. These forests act as essential carbon sinks, helping to absorb and store significant amounts of carbon dioxide from the atmosphere. By acknowledging this science, the USFS should align its practices with broader conservation objectives and contribute meaningfully to climate action efforts.

It is imperative that the Forest Service adheres to the Forest Plan and provides a clear explanation of how they intend to maintain the 7,400 acres of habitat required by Cerulean Warblers in the Jellico's. These habitats are essential for the survival and well-being of these species, and it's critical that they are preserved and protected. By removing regeneration cuts from the project scope and focusing on critical Cerulean Warbler habitat, as mentioned in Objective 1.1.B of the Forest Plan, the Forest Service can demonstrate its commitment to conservation and the broader goals of preserving biodiversity and ecosystem health.

Finally, the Draft EA's analysis of the rampant Tree of Heaven infestation in the Jellico's is grossly understated. Large infestations, particularly stemming from areas previously logged by the Forest Service in the 1990s, pose a significant risk of spread with the proposed logging activities. The potential for Tree of Heaven to foster explosive populations of the spotted lanternfly is alarming, as it can have detrimental effects on neighboring native species and agriculturally important trees, like fruit trees. Regardless of the which proposed action is selected, Tree of Heaven needs to be treated and maintained. The original proposed action addressed a large invasive issue and should not be dismissed regardless of timber volume extracted.

Thank you,

Justin Mog, PhD