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Comments: The Jellico Vegetation Management Project has mandated timber targets that include a more than 400% increase in logging in the Daniel Boone National Forest in the last twenty years. Not only is this increase unacceptable, timber targets are being linked to performance reviews of Forest Service staff, further incentivizing massive extraction from public land. These incentives are incredibly short sighted and don't take long term sustainability into consideration. Forest management practices need to align with broader conservation goals outlined in the Executive Order to preserve mature and old-growth forests. Older forests are essential for sequestering carbon and maintaining biodiversity. The best available climate science unequivocally shows that old growth forests are essential for climate change mitigation. The USFS has a responsibility to align its practices with broader conservation objectives to preserve mature and old growth forests as carbon sinks.

The Forest Service must also adhere to a commitment to maintain Jellicos as habitat for critical and endangered species and the broader goals of preserving ecosystem health. The forest plan needs to provide a clear explanation of how they will maintain 7,800 acres of habitat required by Cerulean Warblers in the Jellicos. Regeneration cuts need to be removed from the project scope in order to focus on Cerulean Warbler habitat, as mentioned in Objective 1.1B of the Forest Plan. This region is also a critical habitat for the *Myotis sodalis*, *Myotis septentrionalis*, both of which are endangered under the Endangered Species Act. The scale, intensity and distribution of regeneration cuts proposed could lead to huge impacts to the endangered bats and other species. There are many more threatened and endangered species in Jellicos and a full survey of the area is absolutely necessary before logging. Please make this survey a requirement in the next phase of this proposal.

The Draft EA's analysis of the rampant Tree of Heaven infestation in the Jellicos is highly understated. Infestations, particularly stemming from previously logged areas by the Forest Service in the 1990's pose a significant risk of spreading with the further proposed logging activities. The potential for Tree of Heaven to create highly increased populations of the spotted lanternfly is alarming, both for neighboring species and agricultural activities like orcharding. Tree of Heaven infestations need to be treated and maintained regardless of the outcome of the proposals.

Costly climate disasters are becoming common occurrences, like the historic and devastating flooding in southeast Kentucky in 2022. Over the last decade there have been nearly 20 federally declared flooding disasters across the region, with the majority in Kentucky and West Virginia. The Jellico mountains represent a critical headwaters area that is steep and landslide prone so it's crucial for comprehensive assessments to be done. The Forest Service's analysis of landslide risks in the Jellico Mountains doesn't address the most relevant issues related to this significant hazard. The Forest Service needs to look deeper at the landslide risks with additional expert guidance.

We are amidst a global climate crisis, unprecedented biodiversity loss, and critically worsening human health. The actions set forth in this proposal are irresponsible. The entire Daniel Boone National Forest Management Plan is meant to be revised every 10 - 15 years. This proposal includes a 40 year logging plan, which is obscene

and irresponsible. The Jellicos needs responsible management that reevaluates and balances the prioritization and funding of early successional habitat with strong and lasting protection for old growth and mature forest, and ensures far more robust, unbiased, and ongoing monitoring and evaluation.