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Comments: I want to voice my objection to the Daniel Boone National Forest's Draft Jellico Vegetation Management Project and its proposed action of timber harvest, intermediate silvicultural treatments, and associated roadwork on approximately 9,600 acres of National Forest lands (NFS). I disagree with the Environmental Assessment that the existing stable and mature forest conditions do not offer sufficient potential for biodiversity and mixed habitat. In fact, the Forest Service's own assessment of the existing structures and ages of the existing project area seem appropriate to good forest health and seem to negate the argument for a 'need' to adjust conditions to favor young and mid-age forests.

Of particular concern is the need to protect our current inventory of mature and old-growth forests, which comprise a significant portion of the project area. 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. 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, and would be counter to the principles and objectives stated in President Biden's recent Executive Order to inventory and protect old growth forests. By acknowledging this science, the USFS should align its practices with broader conservation objectives and contribute meaningfully to climate action efforts.

Another concern is the unknown impact that timber harvest activity may serve to destabilize soil structure and the ability of forest ecosystems to withstand the effects of extreme weather events have been occurring throughout the country, including Kentucky, over the recent years. Given the steep and landslide-prone nature of the Jellico mountain landscape, it's crucial for comprehensive assessments to be conducted. I urge the Forest Service to take a deeper look at the landslide risks and prioritize thorough analysis and incorporate additional expert guidance to better safeguard against landslide risks and ensure the safety and stability of the Jellico mountains and surrounding areas.

I would also note that some of the arguments for action are based on a Forest Plan that is two decades old and is overdue for a revision. The President's Executive Order as an example as well as the U.S. Forest Service's emphasis on timber targets. These policies and plans need to be revised before embarking on a multi decade timber harvest and silviculture management project that will impact the forest and surrounding communities for decades into the future.

Because of these concerns I urge the Daniel Boone National Forest to abandon its proposed action and choose to implement Alternative 2 - No Action. The forest will still be there when additional, more comprehensive studies have been performed and the forest comprehensive management plan has been revised to make better informed decisions regarding this area.