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Comments: I am writing in regard to the Jellico Vegetation Management Project # 63037, a proposed 10,000 acre, 40-year logging plan in the Jellico Mountains in the Daniel Boone National Forest. I strongly oppose this plan for the following reasons:

1. Older forests are vital for biodiversity, carbon sequestration, habitat preservation, recreation, forest health, and water quality. The contention that this logging is needed because the forest is too old (Draft EA p.3), is not supported by conservation science. It is also incompatible to the stated goals of the Biden administration, which has issued an executive order mandating the conservation of mature and old-growth forests. It is also incompatible with the recreation development plans for southeastern Kentucky (old-growth forests are a major tourism attraction; no one wants to visit forests that have been clear-cut or commercially thinned).

2. By prioritizing timber targets, the plan undermines the well-being of our forests and the communities that rely on them. The analysis of landslide risks in the Jellico Mountains is inadequate and does not address the most relevant issues related to this significant hazard. The Jellico Mountains are steep and vulnerable to landslides. Given the damage that extreme rainfalls have caused in southeastern Kentucky over the past few years (e.g. July 27, 2022-45 people died and thousands were displaced) and the expectation that extreme rainfalls will continue to occur, mature and old-growth forests are essential for mitigating these weather events.

3. It is irresponsible to make legally binding, site-specific decisions 40 years in advance. The entire Daniel Boone National Forest Management Plan is supposed to be revised every 10 to 15 years so a 40-year plan is inconsistent not only with responsible forest management, but also with the existing plan for this forest.

I support NO ACTION on the proposed Jellico Management Project. If any plan is approved, I am in favor of Alternative 1 (3,000 acres of logging over 4-6 years, including 1,122 acres of two-age shelterwood and 1,811 acres of commercial thinning) with a modification to manage invasive Tree of Heaven and Autumn Olive.