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Comments: This comment is being submitted to document my objections to the Jellico Vegetation Management Project on the Boone National Forest.

The Organic Act, of 1897, prioritized sustainable water flows over timber production. It appears that the Forest Service staff has forgotten this salient detail when it is promoting the Jellico project alternatives. While all of the alternatives are treating the Forest as a tree plantation, Alternative One is the least damaging simply because it has the least amount of clear cutting and heavy shelterwood cutting.

I SUGGEST ALTERNATIVE ONE WITH MODIFICATIONS TO ADDRESS:

1. WATER

Road building and skid trails on steep ground inevitably lead to more rapid surface flow and erosion with impacts on streams and subsurface flows. The capture and slow release of precipitation is a primary benefit of mature and old growth forest structure. This isn't new science. In the 1897 it was mentioned before timber production. Oh yeah, Biden had to use an executive order to preserve mature and old growth forests. Over 100 years of a directive being in place and it seems to have slipped past the Jellico Project planning team.

I WOULD LIKE TO SEE SOME SERIOUS ANALYSIS OF HYDROLOGICAL IMPACTS, EROSION AND SEDIMENT DELIVERY TO STREAMS.

2. NON-GAME WILDLIFE CONCERNS

Bat populations need refugia of mature and old growth forest lands. Tree farms, plantations, with young trees are lacking in this component, yet a cohort of "young, vigorous and healthy trees" seems to be a desired outcome by the authors of this plan, despite its negative impact on numerous animal species.

SIGNIFICANT DISRUPTION OF THE FOREST IN THE JELICO PROJECT AREA IS PROPOSED WITH ONLY CURSORY INVENTORY OF THE THE ANIMAL SPECIES THAT CURRENTLY MAKE USE OF THE FOREST. AN ADEQUATE SURVEY IS NECESSARY TO DEVELOP A RATIONAL MANAGEMENT PLAN.

WHY WAS THIS NOT DONE?

3. UNDESIREABLE VEGETATION MANAGEMENT

Chemical treatment for Tree of Heaven and grapes is proposed for logged and thinned units. Better living through chemistry hasn't worked out so well. This same old "Forest Management" dance is quite common. "Forest restoration is a good thing, but more timber harvest is necessary to fund the restoration." It hasn't worked in other forests, so we might as well try it here, again, and again. Funny that the Tree of Heaven takes off once the competition is removed. Maybe dealing with the seed source before creating optimum growing conditions for

those seeds might be worth a try? Just a thought.

Grape vines.... Those pesky damaging vines are ruining the forest. They grow with the trees and eventually shade out the tree and kill it. Where did they come from? Oh... ur They were here? But they damage trees. They benefit birds and mammals? Well trees make money for loggers and sawmills. They house people. They make furniture. We want more trees and we don't care about a forestWe want a tree farm.

THAT WASN'T THE DIRECTIVE IN 1897 AND IT ISN'T THE DIRECTIVE TODAY. PLEASE ADDRESS SUSTAINABILITY FOR WATERSHED PROTECTION AND SUSTAINABLE TIMBER PRODUCTION. CONTINUING TO ATTEMPT TO FARM TREES ON NATIONAL FOREST LAND IS NOT THE MANDATE.

PLEASE EXPLAIN.

4. MANAGEMENT BASED ON TIMBER TARGETS

Been there done that. Sustainable management responds to changing forest conditions, such as pathogens, fire, invasive plant species, etc. It also responds to market conditions. Management that addresses forest needs as paramount is more important than providing a set amount of timber for sale every year. A cattle producer with grazing land can't feed cattle if the grass doesn't grow. A timber manager can't continue to provide timber if the forest is struggling from insect or disease outbreak with high mortality. The time frame is different for grazing and forest land, but the dynamics are the same.

PLEASE PROVIDE A RATIONAL EXPLANATION FOR TIMBER TARGETS.

5. CLIMATE CHANGE

The computer models, over the last few decades, have turned out to be wrong. They were too conservative. The effects and rate of change were so unbelievable that the modelers adjusted the models to reflect a slower rate of change. The problem is that it is getting warmer quicker than expected. Trees growing in tree farms lack the diversity and resiliency of those growing in a forest.

Attempting to maintain mature and old growth forests will provide a buffering effect on temperatures.

HOW WILL THESE MANAGEMENT ACTIVITIES IMPACT AND BE IMPACTED BY CLIMATE CHANGE?

Thank you for addressing these comments and questions. I wish you all the best of luck. It is a very difficult job.