

Data Submitted (UTC 11): 5/24/2024 4:00:00 AM

First name: Andri

Last name: Kukas

Organization:

Title:

Comments: I am 100% against this proposed project and request USFS scrap it in its entirety.

The scope of this project is unconceivable. No reasonable person or organization can make a legally-binding 40 year plan for managing the forest, especially given that the USFS management plans are supposed to be updated every 10-15 years. Given that we are seeing destabilized weather patterns more and more, this makes the proposed length of the project more irrational. For example, in May 2024 in some US states, we are already seeing twice the number of reported tornados than the average in previous years. Weather has become so extreme that weather mapping agencies have had to add different colors to the weather radar to represent the increased severity of weather. This circumstantial evidence is heavy when weighted with other data proving climate change is happening and global warming is happening, which is directly linked with burning trees and fossil fuels which puts carbon into the atmosphere, instead of sequestering in the soil and vegetation. Carbon sequestered by large trees is imperative in curbing the effect of climate change, and yet, USFS is proposing to a 400% increase in logging in the Daniel Boone over what has been done in the last 20 years. THIS IS OUTRAGEOUS that the logging is being prioritized over mitigating climate change, overall forest health, water and watershed quality, water pollution results from logging, protecting endangered species like the cerulean warbler and many endangered bats, as well as the introduction of invasive species due to creating disturbed soils. The geographic scale of this proposed project only amplifies these concerns.

The very real risk of landslides from logging on these steep slopes should be enough concern to scrap the project in its entirety. After seeing the pristine waters in the Smokie Mountain National Park this spring, I can assure you that I have not personally seen ANY rivers or streams in KY that are not already brown with silt from erosion. The private lands in KY are not being protected from erosion and it makes prioritizing stabilized soils in our public lands all the more of a priority. Silt from landslides is the number one pollutant in the water, and this proposed project will only increase particulates in the water. NO best management practices in timber harvesting is going to negate the effect of severely increased erosion from the heavy machinery's effect on bare soils. With rain events becoming more severe (more rain in a shorter period of time) we can expect that the bare soils left by clear cutting will cause increased flooding in communities downstream from these Jellico headwaters. Has the USFS included a budget in the proposed project to pay for the loss of life and home and business for the communities it will inevitably flood because it has removed the trees in the headwaters?

Furthermore, the USFS has now started basing performance reviews of its employees based on timber harvests. Could there be a more timber-industry-friendly (and thumb in the face to science) way to evaluate USFS employees than meeting timber harvesting goals? I think not.

Kentucky Heartwood described in detail issues with tree of heaven (*Ailanthus altissima*) in their scoping comments for the Jellico project. Tree of Heaven is a highly invasive, ecologically destructive non-native invasive

plant species (NNIP), and its occurrence in the Jellico project area is extensive. It occurs along roadsides, and numerous stands that were logged in the 1980s or 1990s where tree of heaven represents a significant component of the forest canopy. In some locations, it is a dominant species. This is a pattern widespread across all portions of the project area. The Forest Service's failure to engage in responsible stewardship of these stands during the decades since they were logged has allowed tree of heaven to reach reproductive maturity and produce vast amounts of seed to further infest the forest. The Vegetation Report downplays the impact that tree of heaven is having on the Jellicos, and does not acknowledge that it's found in previously logged areas. The Biological Evaluation and Specialist's Report provides a better discussion of tree of heaven specifically, as well as other problematic NNIPs, stating:

(T)hinning and regeneration activities are likely to increase the population sizes of tree-of-heaven, princess tree and Amur honeysuckle if existing individuals are not treated during or prior to activities. These three species have a high potential to interfere with tree regeneration.

Because of Tree of Heavens extensive root resources, manual control (cutting) mature trees DOES NOT KILL THEM. According to all resources I have read, Tree of Heaven must be treated with poison to kill it, and even then, it often requires multiple applications. Has the USFS considered the impact on waterways of using poison in vast areas of the proposed project area? Has it considered the environmental or economic impact of degraded forests from Tree of Heaven taking over the native trees?

The project area proposes to cut mature forest. In today's world, mature forests are rare and it is shameful as well and SCIENTIFICALLY UNSOUND TO CUT ANY MORE MATURE FORESTS. We need these mature forest for wildlife habitat, weather mitigation, soil stabilization and seed banks for what should be the effort to INCREASE the amount of mature forest, not decrease. The forest in KY is already so fragmented that contiguous forest, which are necessary for animal migration, should be increased and prioritized. Clear cutting mature forest only furthers forest fragmentation.

STOP THIS PROJECT IN ITS TRACKS. The financial gain from timber harvest does not outweigh the cost to the degradation of human, climate, wildlife, and environmental health.