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Title:

Comments: General Statement

It is my intent to reference the comments I posted on December 4, 2022 with respect to the Jellico Vegetation Management Project (the Project). Throughout those comments I consistently addressed my concerns as to how the environment would be negatively impacted if the Project is implemented. Although each of my comments were addressed by USFS personnel, by reference, I am resubmitting those comments. I feel that the comments I posted with respect to each topic was valid then as well as now.

As was voiced during the two public meetings this month, folks are pleased that the USFS has provided and considering two alternates to the Project.

#### Ruffed Grouse

There are those that contend that the Project will enhance habitat for various wildlife, such as the ruffed grouse (grouse). Well, I've lived in the Project area the vast majority of my life. When I was a teenager back in the early 1960s and on into the late 1980s, my friends and I hunted grouse and other game, although not very successful because we never used a dog. We found grouse almost everywhere we went, high on the mountains, in deep coves, on north/east/west/south slopes, on private lands in the valleys along the fringe of the mountains, etc. There was no shortage of "perfect" habitat for grouse. Then, in the early 1990s we began to notice that grouse were missing or all but missing in locations we had encountered them over the years. We no longer heard the males drumming which was a very common occurrence back in those days. I am aware that the ruffed grouse has cycles of decline which experts have not been able to identify as to why. However, the decline, rather, total disappearance from the Project area is now well over 25 years or maybe longer. The Nile Virus is suspected to be a possible reason as to why the grouse is on serious decline. However, it is ironic that no other fowls have been subject to the same decline in the area (the Project area and throughout the eastern USA). My theory is the arrival of the Coyote to the area has taken a toll on both the adult grouse and chicks (and Turkeys). The Coyote come on the scene in about 1989. That's when I first heard a Coyote bark in the Project area where I live. The last time I saw a grouse was in 1996 on my property, which joins USFS property. In fact, it was a hen and at least 12 chicks. That was the first and only time I've been flogged by a grouse. Chemical treatments being considered in the Project area have the potential to eliminate ferns which are a winter staple for grouse. The Project may enhance grouse habitat but there are no grouse to populate it. The private fringe properties, for the most part, contain thousand of acres of prime grouse habitat just like it did 60 years ago when I was a teenager and plenty of grouse. So, supporting the Project because it may benefit grouse through improved habitat is less than valid in my opinion.

Elk

Seems there is a group that may support the Project for the benefit of Elk. Well, the entire Project is located outside the valleys in the Jellico Mountains. The Project area (s) do not contain ample water sources to support an Elk population without the use of adjacent fringe private property. Yes, there are herds of Elk in eastern Kentucky thriving on re-claimed coal strip mine lands in Knott, Breathitt and Perry Counties to name a few. However, those areas do have ample water supplies. The Elk at Cherokee, NC in the Smoky Mountains are in the valleys.

## Bear

The officials in the Smoky Mountains are concerned about the loss of white oak trees during the recent winter and spring storms. They are saying the bear population will be negatively impacted due to the loss of acorns. I suppose this concern applies to red oaks as well. It is a known fact bear have moved into the Project area. Over the last 10 to 15 years numerous sightings of bears have been reported, including the ones my family and I have seen. So, not only will cutting the oak trees in the Project area have a negative affect on food supplies for existing animals, the migration of bear into the region will further stress the existing animals.

Bats, flying squirrels, grey squirrels, red squirrels, woodpeckers, racoon, opossum, nuthatches, chickadees and other animals and birds

They all need older trees, dead hollow trees in particular, to compliment their habitat. The older trees that have been damaged by natural occurrences are more apt to have hollows which provide shelter and nesting opportunities for both birds and animals. Older trees are the ones that produce the food for them. It takes many years for a hollow to develop in a tree that was damaged due to a natural occurrence. Clear-cutting and other forms of timber harvest and management eradicate these trees. Thus, practically any form of logging will negatively affect these animals and birds.

## Flora Biodiversity

The Project area, in fact, all of the property (both public and private) in McCreary and Whitley Counties will rival the Smoky Mountains with respect to its floristic diversity. There are several species of wild orchids that are threatened or endangered because of habitat loss. Does the Project area contain any of these orchids? Orchids have complex relationships with the habitat in which they live. It is known that some are dependent upon the fungi that are free-living in the soil. Others associate with fungi that are also connected to other plants, especially trees. As habitats change, the fungal community changes and orchids may lose fungi upon which they depend for their survival. So, orchids can be wiped-out in areas where the soil is disturbed or alternated by logging or associated road building. There are numerous other species of plants in the Project and adjacent areas.

However, I chose to comment on the wild orchids because they are a favorite of almost anyone that adventures into the outdoors, especially the public forests.

#### Aquatic threatened or endangered species

The Project includes drainage areas into Jellico Creek, Rock Creek, Bucks Branch, Ryans Creek, Hayes Creek, Marsh Creek, Wolf Creek, Little Wolf Creek, etc., of which all contain fresh water mussels and aquatic snails. It is known that mussels improve water quality by filtering out contaminants, sediments, and nutrients from streams. Mussels also function as environmental indicators. They are sensitive to toxic chemicals and serve as an early warning system that alerts us to problems with water quality. Research tells me that mussels are among the most imperiled groups of animals in North America. There are 297 species and subspecies of mussels in North America. Of the 103 species of mussels native to Kentucky, 20 have completely disappeared from the state, and 36 more are considered rare or endangered.. Excessive run-off during heavy rains, not unlike what we've experienced recently, will contain loads of sediment. Although some mussels do bury into mud, they can be killed if buried too deep due to sedimentation. Snails can and do suffer due to excessive sedimentation. Not unlike mussels, fresh water snails are suffering the same losses due to changes in their habitat. We know from past experiences on both public and private lands, logging and the associated road building does and will subject the land to erosion during rains.

#### Honeybees

Although the Honeybee is technically a non-native insect to North America, it is without any doubt among the most valuable insects on earth. Without commercial beekeepers, well, the farmers would likely be unable to feed the world. Honeybees gone to the wild depend on hollow trees to protect the colony. Any form of cutting trees that includes felling hollow trees will be detrimental to the wild honeybee population. I am quite familiar with beekeeping. I practiced the art from 1975 until 2020.

#### Some general observations

#### Past USFS logging projects within the Project area

Over the last 40 to 45 years, there have been numerous smaller areas logged on USFS property south of highway 92 in both McCreary and Whitley Counties. Practically all of those areas were clear-cut. Applying the same rational to those areas being considered in the Project, based on my observations, I do not believe the end results will be achieved. Viable oak stands are basically absent. Some areas were planted in white pine which are not doing well at all. In fact, undesirable tree species seem to be dominating these areas. Stump growth is prevalent throughout these logged areas. Poplar trees seem to dominate followed by dogwood. Although the

evidence is basically gone now, but I've observed perfectly straight unharmed trees cut down because they never met the minimum size standard. That's sort of like turning loose a bird in the hand for two in the bush. I believe we would all benefit from a detailed analysis of these logging areas, especially those areas 25 years and older. I've hunted in or near these areas during the last 25 years and I cannot remember ever seeing or hearing a ruffed grouse.

#### Invasive species

As was voiced during the November, 2022 public meeting and the two public meetings this month, invasive species concerns everyone. The tree of heaven, bradford pear, princess tree and kuduz, to name a few, are spreading like we've never seen before. The Bradford Pear and Princess Tree are scattered all along the new Highway 92 in both McCreary and Whitley Counties. Acres upon acres of the property owned by the University of the Cumberlands (formerly Cumberland College) contains the Princess Tree and Bradford Pear. Clear-cutting and road building are very conducive to supporting invasive species.

#### Conclusion

#### Alternate 1

- Reducing the number of acres to be considered in the Project from 10,000 acres to 3,000 acres is a step in the right direction in my opinion.
- Reducing the Project work period from 40 years to 4 to 6 years is more realistic. This will provide ample time to observe and address the huge number of environmental concerns as they surely will arise.
- Eliminating total clear-cutting and deferment clear-cutting is a significant improvement.
- Removing the 177 acres of old growth from the Project is excellent. However, I believe the areas to be considered for logging in Alternate 1 should be inventoried for trees 100 years old and older for preservation. They are worth saving and they do exist. My maternal grandmother (1890-1986) lived her entire life in the Project area. She was born on Wolf Creek and after marrying, lived the rest of her life on Ryans Creek,. When I was a kid she told me about the logging operations by the Ketchen-Miller Lumber Company. The logging began in the mid-1920s and was basically finished by the very early 1930s. They built a camp on her property for use as the logging took place. They did leave lots of big trees according to her. Those are the trees that we see in the Project area. A 40 or 50 year old tree that was left standing is now well over 100 years old.. Lastly, consider reducing the number of acres in this Alternate (more on this later).

#### Alternate 1, a modification

If chosen, I suggest that the USFS, consider reducing the number of acres in Alternate 1. There are numerous places within the designated acreage of Alternate 1 that contain scattered stands of Mature trees and maybe some old growth that should be protected.

I also suggest that the USFS carve out small areas to be logged by mule. We may be surprised in the number of mule loggers that step forward.

## Alternate 2

The draft environmental review (NEPA) by the USFS has taken over 18 months (give or take a month or two). The report involves a hydrologist, soil specialist, wildlife specialist, socioeconomic specialist, climate change specialist, scenery specialist and references, as well as several other documents and more references. This is a lot of material for the average layman to read, let alone comprehend and comment within 30 days. But, when it comes to cutting the national forest, the majority of folks understand and do not support it. They want to see preservation, more recreational opportunities offered, access via hiking trails, etc. They want it to be here for their kids and future generations. Cutting the trees in the Project area will not bring back the grouse or add anything of significance for the elk which is not here yet. However, cutting the forest will be detrimental to all those flora and fauna as mentioned herein.

In closing, I strongly encourage you, keepers of the public's forest, to consider Alternate #2 as a viable option. To do so is not a loss. It has been a learning experience for all involved. Let us be a helpful guide in conserving what's in our hand now and to assist with a strategy to provide recreation opportunities in the Project area. The new highway 92 provides the opportunity for access to and use of any recreational development in the area.

I strongly encourage the USFS personnel to not chose the original Proposed Project. That choice would be totally against the majority of those that have voiced their desires and concerns to date. Each of those that have objected to the original project have family and extended family members with the same concerns about the Project.

Lastly, President Joe Biden issued an executive order on Earth Day 2022 to study ways to strengthen the country's forests. That order states, in part,, "to pursue science-based, sustainable forest and land management; conserve America's mature and old-growth forests on Federal lands." If the areas within the Project are cut-over before they are studied it will be too late for the mature and old growth within the area. Keep in mind that the definition of a "mature tree" has a different meanings relating to its intended purpose. There are trees on my property (and the USFS's property) that are older than me but way too small to meet harvest standards.

Thanks for the opportunity to participate in the decision making process involving the use of the forests of the people.