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Title:

Comments: I am writing this comment as a private citizen and lifelong Kentuckian. Most vacations throughout my life have been hiking, biking, and camping on public lands. Like an overwhelming majority of Kentuckians, I am against this logging proposal. I understand that the Daniel Boone National Forest (DBNF) has management directives that have given it specific amounts of timber that must be cut each year, and this proposal is a way to meet those timber targets. I also understand that the local Forest Service staff is receiving these directives from their supervisors/agency leadership, so my comments are not directly targeted at local staff (who I understand are just trying to fulfill their job duties). I know that you are between a rock and a hard place. I hope that whoever is reading this doesn't take the criticism personally. We are all stuck in the same system that prioritizes profit over people and ecology.

Having commented on both the scoping and Draft EA phases of this project, it is easy to see why people are fed up with the federal government. Reviewing the scoping comments, some of the responses feel dismissive. When the public has a rare opportunity to engage in communication with the agency, they don't want to hear things like "this is outside the scope." If comments are "outside the scope," then where are the opportunities for the public to engage in forest management ideation and discussion that are "in scope?"

The forest planning process is the appropriate time for the public to give input on overall management direction of the forest. Except the problem with that is the forest plan for the DBNF is already woefully out of date, and there has been no public communication about when to expect that planning process to start. So, the public's only choice is provide their "out of scope" feedback every chance we get.

It feels like the Forest Service has forgotten what the term "public lands" means. A perfect example of this is the Draft EA comment period. There was no mention of it on the DBNF's Facebook page. Social media channels are the easiest way to engage the public, yet the Forest didn't use it. Did you not want the public to comment on publicly-owned lands?

Luckily, there has been an enormous community organizing effort at the local level, with neighbors spreading the word about the Forest Service's proposal- with community meetings, newspaper articles, church conversations, and more. Having spent a decent amount of time studying plants and enjoying the gorgeous scenery in the Jellico's in the last few years, I have yet to encounter anyone from the local community that supports this project, but I have a met a whole bunch of folks who love the mountains.

With nearly 600 comments and counting, only 40 or so support this logging. Of the supporters, the majority are from the Ruffed Grouse Society, Rocky Mountain Elk Foundation, or are otherwise financially affiliated with those two organizations (like the Kentucky Department of Fish and Wildlife). Even the Forest Service is financially affiliated with those organizations. I also find it interesting that while the Draft EA did not mention grouse or elk,

these pro-logging, single-animal hunting groups seem to have taken a special interest. They are commenting as though the "purpose and need" of the project is for grouse and elk! If the Forest Service is meeting with the Ruffed Grouse Society and Rocky Mountain Elk Foundation about this project, this should be disclosed to the public.

It seems odd to manage a forest for two animals that aren't endangered, especially since that same forest houses at least 6 animals that are endangered. It is convenient that grouse and elk are purported to like "young" forests, as it certainly makes it easier to log for "habitat." (For a full analysis of this push for young forest creation, see Kellet, et al. Forest-clearing to create early-successional habitats: Questionable benefits, significant costs. At https://www.frontiersin.org/articles/10.3389/ffgc.2022.1073677/full)

Speaking of young forests, the Forest Service needs to consider all the land in the Jellicos, not just the land owned by the federal government. There is one private entity in particular that has already clear-cut a lot of forest directly adjacent to the public land. There are also farms in the area that may be using NRCS (part of the USDA, just like the Forest Service) conservation practices, including the creation of young forest habitat. All of that data is easy to find and should be incorporated into the Forest Service's analysis in order to understand what habitat diversity already exists in the project area.

We know that recreation is more economically beneficial to local communities than timber harvest. Why does recreation continue to suffer across the DBNF while the interests of the timber industry are prioritized? (For examples of recreation suffering, see the closure of the Rockcastle campground, the lack of paid staff positions at Gladie visitor center, the proposed recreation fee increases, the lack of any hiking or biking trail whatsoever in the Jellico area of the DBNF, etc. etc.) It is time to get our National Forests out from underneath the Department of Agriculture. Our forests are more than a crop, they are the simplest way to mitigate climate change and provide invaluable health benefits to ecosystems and people.

PS: If I was going to pick one area of the Draft EA that I am most concerned about, it is the landslide risks. They are serious. Eastern Kentuckians are tired of extractive economies messing up the mountains and creating long term, down stream problems. The federal government has an opportunity to do the right thing here. Please do it!